

Claire Smith  
116 Medana Street  
Victoria, BC

Mayor and Council  
City of Victoria

August 3<sup>rd</sup>, 2022

***Missing Middle Housing August 4<sup>th</sup> Public Hearing Submission***

The current proposal for Missing Middle Housing *IS MISSING ALL ASPECTS of AFFORDABILITY*, and opens the doors wide for further high-end units created by for-profit Developers at the cost to the very people we wish to ensure have homes in our neighbourhoods. As proposed, it would open the door to over develop or tear down houses all over the city; eroding the affordable housing that currently exists, only to replace it with the unaffordable. Developers and REITS from Toronto, Vancouver, and foreign investment are now reaping the profits that the Victoria market offers, and these multiplex options will only increase their profits and take more housing away from those that need it.

Vancouver, Halifax and Toronto are great examples of how this system does not work!

Let me be clear, as a home owner and resident, I support smart infill and density of our single-family homes, something the denser neighbourhoods like James Bay and Fairfield have done for decades by having rental suites in many of the homes (most not registered). On my street most of the houses have secondary suites or multiple suites per house. We are not NIMBY's, most of my neighbours support SMART infill and density!

*Missing Middle Housing*, as it is currently written, does not support this in-fill in a smart way, rather it pushes out existing tenants and creates higher rents, with less liveable options for families. Developers are counting on this! MMH, as proposed, DOES NOT built-in secure rental protection or affordability for anyone!

The housing market is remarkably different than it was even two years ago and good urban planning, with smart rental subsidies and protections and first-time home owners' grants are the keys to smart development and affordable housing.

At a recent meeting on MMH, Mayor Helps said *"If we refer this back and get staff to do more engagement, it's just going to be a repeat performance of the hard work that staff and the public have been doing on this for two years," she told council. "We can't learn by just thinking and studying; we have to learn by doing."*

Since when is consultation and community planning a bad choice? Thinking and studying, working with Urban Planners, and other government programs to support good infill and affordability is a far better option than charging ahead because this council's time in office is short! Pushing ahead a proposal that is clearly not ready will only make it harder for renters and first-time home buyers!

I would think that Council would welcome voters' input into what is best for our city and our neighbours!

I strongly recommend that Mayor and Council listen and learn from the input received at the August 4<sup>th</sup> public hearing. Public input and smart-informed planning and rental protection are the keys to solving the housing crisis! Not opening the door to developers to increase the already unaffordable housing options being rented and sold to the highest bidders for the profits of a few.

Sincerely,

Claire Smith

[REDACTED]

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**From:** Alyssa Boky [REDACTED]  
**Sent:** August 3, 2022 6:43 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Initiative

Good Evening,

I am unable to attend the Public Hearing on August 4, 2022 for the Missing Middle Housing Initiative, however I would like my STRONG OPPOSITION of this initiative to be noted.

I am one of the owners of and live at 1407 Thurlow Road in the City of Victoria. My partner and I are young professionals working for the government and are lucky enough to call Victoria home. While I believe density is important in ensuring the vibrancy and affordability of neighbourhoods, I strongly believe that the Missing Middle Initiative has not adequately considered the affect on those that own property and live within the community. This initiative would apply blanket height allowances across neighbourhoods previously zoned for single family homes, increasing the height allowances to 10.5M. This would mean new missing middle housing would tower over neighbours rather than fit within the existing city scape. It would also allow up to 8 units on a standard single family lot. This would destroy the community feeling that has been built, and our family would strongly consider moving away from the City of Victoria as would many in my neighbourhood likely would should this initiative be passed in its current state. The initiative unfairly favours and biases developers providing incentives for development while leaving everyone else without an opinion allowing developments to be pushed through with limited consultation. Perhaps an initiative should be focused in certain neighbourhoods or in major areas but a blanket application as proposed is horrendous. This will not improve affordability, and Lisa Helps has even been quoted stating that this is not meant to help affordability. Focus on densifying the core rather than impacting residents.

This is not the solution!!! I STRONGLY OPPOSE the missing middle initiative.

Regards,

Alyssa Boky  
1407 Thurlow Road

[REDACTED]

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**From:** Arielle Guetta [REDACTED]  
**Sent:** August 3, 2022 4:39 PM  
**To:** Public Hearings  
**Subject:** Support for Missing Middle Housing Initiative

Dear Mayor and Council,

My family and I support the Missing Middle Housing Initiative and the proposed amendments to the Zoning Regulation Bylaw, Official Community Plan and related policies.

We live in Vic West and this new initiative would benefit our growing family and allow us to stay in the community we currently live and work in.

Thank you for your consideration.

Arielle Guetta

[REDACTED]

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**From:** Anna H-G [REDACTED]  
**Sent:** August 3, 2022 11:11 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

Good evening!

I wanted to state my support for policy that facilitates development of townhomes and houseplexes. I live in the duplex that I am fortunate enough to own with my partner and one of his sisters, and I am exceptionally grateful that we had this incredible home available to us when my partner and I were looking to have his sister move in with us. We had outgrown the apartment we were living in, and a single detached home was absolutely not an option financially, even for three adults with full time salaried jobs. Because we had a middle housing option, the three of us have been able to stay in the city, keeping our community involvement and specialized skill sets here as well. I have many, many friends for whom staying in Victoria is not an option, and they are taking their families and their training in higher education with them. For some, more townhomes, duplexes, and triplexes would mean more housing options they can afford. For others, even these things are not affordable, but more middle housing would result in increased housing supply overall, giving them a better chance at accessing apartment housing they could afford.

Thank you for taking the time to read my email in support of missing middle housing.

Anna Hayashi-Galbraith (she/her)  
Sent from Ləkʷəŋən land.

[REDACTED]

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**From:** Andrew Nicholls [REDACTED]  
**Sent:** August 3, 2022 1:58 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Initiative

Hello Mayor and Council,

My wife and I would like to convey our strong support for the missing middle initiative. This is so important for the city to remain a place for all walks of life to live and work.

Please move this forward to keep Victoria wonderful and inclusive.

Thank you to those of you pushing this thoughtful initiative.

Andrew and Bonnie Nicholls  
106 Medana St, Victoria in James Bay  
[REDACTED]

433 Powell Street  
Victoria BC V8V 2J3

Dear Mayor and Council:

Re: The Missing Middle Housing Initiative Vote (MMHI)

In an effort to better understand Victoria's MMHI I've read, with great interest, how other cities in both Canada and the USA have responded to their lack of affordable housing.

Kelowna, for example, introduced RU7 zone permits, "versatile infill housing that remains sensitive to surrounding neighbourhoods. RU7 zoning allows between two and four units, depending on the width of your lot."

Adam Wilson, (a Kelowna resident who holds a Masters Degree in Urban Planning; former Director of Communications and Issues Manager to Ontario's Minister of Municipal Affairs and Housing), wrote that *Kelowna's RU7 zoning resulted in developers selling individual MM units for significantly more than the price of the original single family homes they demolished.*

Why would this scenario play out any differently in Victoria? Even "below market" rates are not 'affordable' for average income earners in our city.

Drawing on a key principle from the 'Strong Towns' movement that embraces the Missing Middle concept: One, "*No neighbourhood should experience radical change,*" and, two, "*No neighbourhood should be exempt from change.*"

Passing Victoria's MMHI makes no allowances for such worthy principles. Why not begin with a *trial* rezoning in the city's neighbourhoods with larger lots that can accommodate more density and then assess the results instead of passing a blanket zoning across Victoria?

I strongly urge you to vote No to this initiative as presented.

Sincerely,

Coralee Bell







**Community Builders...**

**Building Communities**

August 3, 2022

Mayor Lisa Helps and Council  
1 Centennial Square  
City of Victoria  
Victoria, BC V8X 2W7

Dear Mayor and Council,

**Re: Missing Middle Initiative**

The Victoria Residential Builders Association supports the missing middle Initiative intended to make the best use of existing land for housing.

A review of properties at the BC Assessment Authority's website demonstrates that a large part of a home's price is tied up in the lot. For example, a Victoria home on an 11,620 sq ft lot was most recently assessed at \$1,309,000. The land is \$1,199,000 and the building is \$110,000.

More than 100 years ago in James Bay, homes were built on lots of 2,000 sq. ft. Many are now heritage homes in a walkable, compact community. Certainly there is room for more housing today on lots five times larger.

Portland, Oregon recently adopted a bylaw allowing up to six units on single detached lots. Yet in many of our local municipalities, a simple duplex violates zoning.

Recent data from the Victoria Real Estate Board reveal the demand for missing middle housing. Prices declined slightly for single detached homes and condos due to rising interest rates. However, townhomes were the exception, where sale prices continued increasing.

The shortage of missing middle housing is clearly evident in the most recent CMHC data. New semi-detached and row housing totaled zero, year-to-date in Central Saanich, View Royal, Saanich, Oak Bay, North Saanich, Metchosin, and Highlands.

As for affordability, Victoria is one of the slowest, most costly municipalities in which to build new housing. Any initiative to save time and money through rezoning will ultimately be reflected in more affordability than the existing environment.

If you require additional information, feel free to contact me at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read "Casey Edge".

Casey Edge  
Executive Director

**From:** Colin Merriam [REDACTED]  
**Sent:** Wednesday, August 3, 2022 2:58 PM  
**To:** Public Hearings  
**Subject:** Public Hearing - Missing Middle Housing

Dear Mayor and Council,

Thank You all for your hard work and your willingness to take on bold initiatives to address the many challenges our city faces.

I believe that creative solutions are needed to combat the affordability crisis, however I am greatly concerned by many aspects of the missing middle housing initiative:

- 1) Despite the engagement undertaken, there is very poor community awareness of this and the implications on the community. Virtually no one I speak to in the community understands this is happening and is taken back when I mention some basic points of what is proposed. Something of this scale needs widespread community awareness, and that simply has not happened.
- 2) Allowing 3 full stories is significantly out of character with the neighborhoods, creates major privacy overlook conditions, isn't even consistent with the stated design guidelines, and would come at a complete shock to the neighbourhoods when constructed to this size. In an information session it was stated by staff that this was a result of early engagement feedback. Comments from a few individuals in early engagement is not at all representative of how the community views this.
- 3) The missing middle needs to provide a housing type that differentiates itself in a meaningful way from a condo. The houseplex model is simply a small condo building, this is not the middle, it is just increasing the condo supply. The fact that these condos are within a unique building type is unimportant and besides the point.

For these reasons I do not support the missing middle initiative as currently proposed. Please don't do an outgoing council "mike drop" only for there to be major backlash and have the whole thing repealed. Get the details right, or we will just be going backwards.

I know you are past the point of alternative suggestions but I strongly believe in the below strategy as a simple way of increasing housing supply in existing neighborhoods, which retains neighborhood character, provides an actual middle housing option, and gives existing owners a financial mechanism to realize them.

- Allow a minimum lot size of 2,500sf at a 25' minimum width frontage
- This allows for a typical 50'x100' lot to be subdivided down the middle
- Two modest sized ground oriented homes each with secondary suites can then be created
- Construction of a new home can be financed by existing owners through the sale of the other half of the lot
- Existing setbacks to neighboring properties can be maintained, allow a reduced interior lot line setback which only affects the other newly created lot
- Existing neighbourhood character is maintained through no increases to height, or reductions to rear yard setbacks
- These lot sizes have precedent in other major cities

Colin Merriam  
2736 Scott Street

[REDACTED]

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**From:** David Berry [REDACTED]  
**Sent:** August 3, 2022 2:03 PM  
**To:** Public Hearings  
**Subject:** MMHI support

Hi all,

I would like to express my overwhelming support for the missing middle housing initiative. This is an ever-needed change to the housing policy in Victoria. No longer should we be a city that says 'I got mine' and then watch housing prices escalate at an exponential rate. We need infill housing to help keep up with the demand of an ever-growing city.

I am 28 years old and live in Gonzales. My generations/friends have been effectively shut out of our housing market. This has been seen in so many industries that are struggling to find workers, it's seen in our elderly who cant find places to downsize, it's a problem that is hitting at all different angles. Imagine a world that allowed infill development similar to the MMHI since the 80's. Would we be having these issues? if there were older townhouses in Fairfield, would my generation be able to find a place to live and stay in the city that we grew up in and love? Would we be seeing wartime stucco bungalows being torn down and redeveloped into 3 million dollar mansions in a time when we need cheap housing the most?

Yesterday was the best time for this policy and today is the next best time. The Millenials are now the working class, and they cannot find housing in our city. I have friends that both work professional jobs that live in a run-down condo. This should not be the case, they should be in a newer missing middle-type home, and that older condo should be attainable for someone that is not as well off as them. They should not have to compete with the less fortunate for housing. This crisis that we are in is caused by exclusionary zoning, and it's being felt all over the age and income brackets.

Please, please vote to pass the missing middle housing initiative on Thursday. I understand that this is not a silver bullet, it is something that can be built upon, something that can be shaped over time. Single-family only zoning from the 1970's is not.

Thank you for your time

David Berry

**From:** Dave [REDACTED]  
**Sent:** Wednesday, August 3, 2022 3:36 PM  
**To:** Public Hearings  
**Subject:** Fwd: Missing Middle Housing Initiative - my earlier letter

----- Forwarded message -----

**From:** Dave [REDACTED]  
**Date:** Wed, Aug 3, 2022, 14:03  
**Subject:** Missing Middle Housing Initiative - my earlier letter  
**To:** Victoria Mayor and Council <[mayorandcouncil@victoria.ca](mailto:mayorandcouncil@victoria.ca)>  
**Cc:** Karen Hoese <[KHoese@victoria.ca](mailto:KHoese@victoria.ca)>

Dear Mayor and Council,

I just wanted to ensure that you still have my May 4 letter on the Missing Middle Housing Initiative, below.

Yours truly,  
Dave Thompson  
Victoria

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May 4, 2022

Mayor and Council  
City Hall  
City of Victoria  
Sent by email to [engage@victoria.ca](mailto:engage@victoria.ca) and [mayorandcouncil@victoria.ca](mailto:mayorandcouncil@victoria.ca)

Dear Mayor and Councillors,

**Re: Villages and Corridors Planning and Missing Middle Housing Initiative**

I write regarding Villages and Corridors Planning (VC), and Missing Middle Housing Initiative (MMHI).

As I noted in my earlier letter supporting the City's Rapid Deployment of Affordable Housing (RDAH) proposal, increasing housing availability and choice within the City of Victoria - where people can live closer to employment, shopping and other destinations - will help to:

- Increase resident access to services and employment opportunities;
- Reduce labour shortages that are impacting businesses and causing shorter hours and closures;
- Enlarge the pool of customers for local small businesses;
- Reduce suburban sprawl, and the resulting clearcutting of forests, pressure on agricultural lands, traffic, pollution, and GHG emissions; and,
- Increase the amount of taxable property in the City, and thereby help support public services and reduce future tax increases for residents and businesses.

In addition to allowing and supporting more public, co-operative, and other forms of non-profit and below-market housing (RDAH), we need to enable housing generally that is attainable for workers, young families

and others who are being shut out by the rapid increase in home prices. Victoria is not producing more land, so this will need to be done through creating homes on our existing land base - doing more with what we have.

It has become very clear that the provincial government is considering reducing the ability of municipalities to restrict housing, and requiring municipalities to allow more new housing. Obviously a one-size-fits-all approach is less than ideal, and the province may leave more autonomy in the hands of municipalities that proactively allow more housing. I urge Council to be a leader in enabling more of all types of housing, so that Victoria is well-positioned to retain more autonomy to shape development to fit our unique municipal needs and goals.

I hope to see the City advance and make improvements to VC and MMHI as these initiatives proceed to later stages and implementation (whether the improvements are within these initiatives or in complementary policies).

For example, we urgently need to **prevent displacement of more renters** - the majority of Victoria residents - into homelessness, core housing need (already affecting over 20% of residents), or needing to leave the City for housing. Displacement is already happening, even without these initiatives that will create more housing, and we need to fill renter protection gaps left by existing policy frameworks of the Province and the City. I urge the City to look at best practices (e.g. Burnaby) and make various adjustments as needed. We don't need to sacrifice improved housing supply or renter support; we can do both.

The City needs to **allow more homes within walking distance of transit stops** and other amenities. This will help provide better transportation choices to people who do not own cars, improve transit ridership and revenues, and enable much-needed transit service improvements. This said, it is important that the finalized version of VC not be restricted to just concentrating new homes in narrow strips adjacent to busy roads (heavy motor vehicle traffic has adverse health and wellbeing impacts, particularly for children, seniors, people with disabilities, and other vulnerable community members).

While allowing more housing, Victoria can and should **protect urban parks and other greenspaces, expand them, and make them more usable for more people** - particularly in areas underserved by such spaces. We also need to **make greenspaces around new homes more usable to children and families**, which could include more flexibility for owners to allocate sizes and uses of front and back yards, and to reduce or eliminate paved surfaces on their properties.

The City should also allow more **flexibility for homeowners who wish to contribute to the supply of affordable housing**, for instance allowing house conversion rules to apply to a wider range of houses, and allowing homeowners to install an extra rental suite (above current allowances) along with the extra space that it requires.

Finally, as I noted in my letter on RDAH, the City can adjust or change course in the future if needed. In the meantime, the City needs to act with the appropriate level of seriousness and urgency to address the housing crisis.

I look forward to seeing the final products of the RDAH, VC and MM initiatives, and to seeing more housing choices, more protection of renters, and a more vibrant, healthy and livable Victoria.

Yours truly,

Dave Thompson  
Victoria

Cc. Karen Hoese - Director of Sustainable Planning and Community Development [KHoese@victoria.ca](mailto:KHoese@victoria.ca)

[REDACTED]

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**From:** Dave Van Ommen [REDACTED]  
**Sent:** August 3, 2022 5:09 PM  
**To:** Public Hearings  
**Subject:** I support the Missing Middle Housing Initiative

Good afternoon,

My name is David Van Ommen and I live in Victoria on Fern Street. I live in a 2-bedroom apartment with my wife and 2 kids (1 boy and 1 girl). I would love to see more options for affordable 3-bedroom and family housing.

I fully support the Missing Middle Housing Initiative and encourage Victoria Council to pass the zoning changes after the public hearing is complete.

Long time single house owners will likely be against the idea because they think it's densification. Well sorry, the world continues to grow and people who have been living in Victoria for years would like some affordable options, too.

Please adapt, Victoria. This is the first step. The next is incentivizing smaller developers to build the higher density dwellings.

Also, please put pressure on the provincial government to investigate how many houses are being bought by investment companies (and then rented out or flipped 1-3 years later).

Thank you very much,  
David

[REDACTED]

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**From:** Doug Woodall [REDACTED]  
**Sent:** Wednesday, August 3, 2022 3:21 PM  
**To:** Public Hearings  
**Subject:** MMI by-law amendment public hearing

As a citizen of Victoria, it is my opinion that a vote on the Missing Middle by-law amendment should **NOT** go forward until a date in the future for these reasons:

- A) There is increased opportunity for citizen awareness and study, particularly since the open house information sessions are taking place in the summer.
- B) There is added time for individual home owners and renters and others to read, digest the complexities, and become fully knowledgeable and able to converse about the pros and cons of the proposed by-law changes and implications - as opposed to developers.

I consider myself an intelligent person, but I have not been able to understand the complexities of the proposals and all of the possible implications of sizes, heights, set-backs, etc.

I want more time for people on every block and neighbourhood to have not just supporters of the by-law but panels of informed presenters help us to envisage what the changes might mean and look like. That is:  
Give lots of opportunity to ask "what if" questions.

We were out of town for summer commitments so could not attend the public education sessions.

Most importantly, I think that the proposal should be a consideration when considering voting for the next council in November. This is perhaps the largest, and one of the most impactful, proposals to be considered by voters in Victoria and deserves to have more public input. Hence, I do not think that this matter should be voted on by outgoing council members.

Douglas Woodall  
1011 Moss Street,  
Victoria, BC. V8V4P2

[REDACTED]

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**From:** Erin Grypma [REDACTED]  
**Sent:** August 3, 2022 8:42 PM  
**To:** Public Hearings  
**Subject:** Written Comments - Missing Middle Housing Initiative Public Hearing

I'm writing to express my strong support for the Missing Middle Housing Initiative. Victoria has fallen behind when it comes to attainable housing options and this initiative will be a huge step towards closing that gap. Increasing the supply of multi-unit dwellings will only benefit the city by attracting and retaining young professionals, providing options to retirees, boosting the economy, and energizing the downtown core and surrounding communities.

I am a 29 year old woman working in Victoria's tech sector. I would love to continue living in the city but the current housing options available are making it increasingly difficult to envision a future here. Without initiatives like the Missing Middle Victoria will become an unattainable city void of diverse and thriving community.

Erin Grypma  
602-1034 Johnson Street, Victoria BC



[REDACTED]

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**From:** Eden McDonald-Yale [REDACTED]  
**Sent:** Wednesday, August 3, 2022 3:20 PM  
**To:** Public Hearings  
**Subject:** Written Comments for the August 4, 2022 Public Hearing

Good afternoon,

I am writing to express my support for the changes outlined in the Official Community Plan Amendment Bylaw No. 22-044 and the Zoning Regulation Amendment Bylaw No. 22-045. These amendments will help to remove additional (and unnecessary) barriers to the development of Missing Middle housing.

Promoting the resurgence of Missing Middle housing is important for a number of reasons. These types of developments have the opportunity to cater to a wide range of people because they can provide various types of units at different price points. Departing from the standard residential neighbourhood form of low-density single-detached homes and encouraging more compact developments will allow Victoria to be more environmentally and economically sustainable in the long-term.

Council discussions regarding the Missing Middle Initiative seem to have suffered from scope creep. The proposed amendments to the OCP and Zoning Bylaws should not be halted under the guise that they do not do enough to promote affordable housing. While the need for affordable housing is an incredibly pressing issue for the City and region as a whole, the Missing Middle Initiative should be seen as one piece of the puzzle. There is no silver bullet solution to the housing crisis. These bylaw amendments should be seen just as what they are – changes to existing policy that allow that existing policy to operate and function as intended.

Thank you,  
Eden McDonald-Yale  
Resident of Downtown/Harris Green

[REDACTED]

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**From:** Fiona W [REDACTED]  
**Sent:** August 3, 2022 8:16 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Hearing

To whom it may concern,

I'm writing this message with regards to the Missing Middle Initiative public hearing on August 4th. Unfortunately I'm unable to attend in person, but I feel that this hearing is of great importance and I truly wish I could be there.

My partner and I are in the 25--35 age range. We are both educated professionals with steady jobs (I work in publishing, he works in healthcare). Even with our combined income, housing prices in Victoria are so that we have completely given up on owning a home here. Even a two-bedroom apartment is out of our reach. Most of our friends are in a similar situation. We are all struggling to get by, delaying starting our families, and many of us are considering leaving the city altogether. Living here has become synonymous with giving up on one's dreams.

If Victoria begins to lose her middle and lower income residents, who will be left to run the essential services that the owners of single-family homes benefit from? Who is going to stock the shelves, clean the floors, staff the medical clinics, man the front desks, teach their children, or pave the roads that they drive or bike on? I would hope that these concerns would triumph over petty complaints about altering the character of a neighborhood by allowing rezoning.

By adding my voice to the conversation, I hope to impress upon you that the results of this initiative will shape Victoria's future, for worse or for better.

Warm regards,

FW

**From:** Victoria Mayor and Council  
**Sent:** August 3, 2022 2:07 PM  
**To:** Public Hearings  
**Subject:** Fw: Zoning Amendment Bylaw No. 22-045

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**From:** G. Van den Brink [REDACTED]  
**Sent:** August 3, 2022 2:01 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Zoning Amendment Bylaw No. 22-045

Dear Mayor and Council,

Over the years, family members and I have been both renters and owners in James Bay, Fairfield and Rockland.

All of these neighbourhoods are known for their different characteristics. However, one common theme for us was the lack of single family dwellings. We have lived in heritage and older homes – all of which were converted to apartments. Ownership has involved condominiums (both 30+ units).

While more housing is needed, I'm not in support of Zoning Amendment Bylaw No. 22-045 at this time. A blanket up-zoning of land across the city requires more public consultation and engagement than is currently being undertaken. It feels as if this is being pushed through so that current council and mayor can feel they left a legacy project. It is also disingenuous in trying to look as if something is being done in last few months of a four year term.

There are a number of concerns including the possibility that the land value of a single family dwelling will drastically increase if suddenly a townhouse or multi-story building can be built under this blanket zoning. If land value increases, there will be a need to sell or lease units at a higher price / rent which is not the aim of the "middle missing" from what I understand. Will this also result in replacing houses with suites with more expensive units? If land values increase, how much longer before property taxes increase; e.g. will a senior living in their long-standing home face increasing taxes? People should not have to resort to deferring property taxes or taking out reverse mortgages to keep their home.

I'm not saying that providing "middle missing" housing is wrong. I'm saying it is wrong to do it in such a hurried fashion without fully defining such terms as "affordable" and having data on which areas / parcels would be affected. We also need to consider the implications on our local neighbourhoods and outcomes of such an undertaking.

Thank you,  
G. Van den Brink

Sent from [Mail](#) for Windows

[REDACTED]

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**From:** Janet Boyle [REDACTED]  
**Sent:** Wednesday, August 3, 2022 3:44 PM  
**To:** Public Hearings  
**Subject:** Missing Middle

I am opposed to the Missing Middle proposal. I feel that there needs to be more municipal oversight over the granting of building permits than the proposal calls for. Residents of neighbourhoods also deserve to have input into the evolution of their communities. I feel that the M.M. Proposal gives developers more power than they should have. I would have liked this proposal to have been considered by a new Council.

Thank you.  
Janet Boyle  
6-2715 Shelbourne St.  
Victoria

[REDACTED]

[REDACTED]

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**From:** James Gray [REDACTED]  
**Sent:** August 3, 2022 4:30 PM  
**To:** Victoria Mayor and Council; Public Hearings  
**Subject:** Writing in full support of the MMHI

Dear Mayor and Council,

I am writing to again express my full support for the Missing Middle Housing Initiative. We are in a housing crisis which has had significant impacts on my friends, family, and community.

Rezoning will help address the housing challenges many people face and it will also tackle other important issues from climate change to the labour shortage.

Please pass the important measure without delay.

Best regards,  
James Gray  
[REDACTED]

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:48 AM  
**To:** Public Hearings  
**Subject:** FW: Regarding Missing Middle

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**From:** J Green [REDACTED]  
**Sent:** August 3, 2022 1:01 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Public Hearings <PublicHearings@victoria.ca>  
**Subject:** Regarding Missing Middle

Dear Mayor and Council,

I'm writing to express my strong support for the Missing Middle Housing Initiative, and to ask for your approval on this plan tonight.

You've heard many eloquent, passionate, and data-driven appeals, so I will keep this simple

- Victoria has a serious housing crisis that continues to get worse
- The city has spent years working on this initiative, and there has been extensive public consultation to arrive at the plan as it stands today
- Anything that doesn't fit within guidelines in the Official Community Plans will still require review and approval
- Building Missing Middle housing on a property that is being rented to tenants could result in displacement. Building Single Family Housing on a property that is being rented to tenants would also result in displacement.
- Building Missing Middle housing types will result in more units than building Single Family Housing, providing more housing supply
- Concerns about ideal shading, setbacks, parking, and character are important, but are not of equal or higher importance than people not having a place to live
- Victoria needs a range of housing options and solutions to allow a range of people to live here
- Passing this initiative to make it slightly easier to build Missing Middle housing can contribute to slow and steady improvement over time

Overall, this would not result in any dramatic change, and would simply remove the time and cost barriers (for the city as well as property owners) that applications to build single family homes do not face. I'm surprised that this modest proposal has resulted in such controversy, and respectfully ask that you consider the core needs of our community. The crux of the matter is that Victoria needs more housing of all types, and this initiative is a small step in that direction.

Please pass Missing Middle tonight.

Sincerely,

Jasmine Green  
V8T 3G9

[REDACTED]

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**From:** John-Michael McColl [REDACTED]  
**Sent:** August 3, 2022 6:51 PM  
**To:** Public Hearings  
**Subject:** Re: Following up on my message to Mayor and Council

Hello Public Hearings,

Thanks for the reply. Based on that information, I would like my original submission to be replaced with a new email. You will find it below. Many thanks!

Mayor and Council,

My name is John Michael McColl, I live at 2644 Roseberry Avenue here in Victoria.

I'm writing in support of the Missing Middle Housing Initiative.

Yes, we need more affordable rental housing, and yes we need more supportive housing.

But we also need more of the kind of housing that middle income families are looking for, and can afford. If our city is to remain vibrant and inclusive, we need to increase the supply of many kinds of housing, and the Missing Middle Initiative is a critical part of the solution.

But hopefully you know that already.

The point I want to make is that now is the time to approve this initiative.

Planning and housing experts on city staff have been developing and consulting on this policy for *years*.

Of course if you dig around long enough, I am sure you will find a question that staff cannot answer with absolute certainty.

And there will always be people who don't feel they have enough information or opportunity for input.

No policymaker gets to make decisions with absolutely perfect information. But as leaders, you can make decisions with very good information. Decisions based on evidence and consultation. That's what we have with the Missing Middle Initiative - an extremely carefully considered policy, based on the work of experts, that the public has been consulted on time and time again.

Now you're hearing from some people who have 'done their own research' and claim this policy may not work, or will have some disastrous consequences.

I hope you will have some faith in experts. City staff with genuine expertise are recommending this approach after years of work. Other cities have adopted similar policies. Now Victoria needs you to move forward.

I hope you will consider the big picture, and remember what we do know:

We know that there is a desperate shortage of housing in our city that is having real impacts on people's lives, and the life of our community. We know the demographic balance of our city is changing. Families with children choosing to make their lives elsewhere – that vitality of our city is bleeding away.

Deferring a decision on this initiative is a decision to continue that bleeding.

We have been in a housing crisis for years. The time for action on this policy is now.

There is no such thing as a perfect policy. This Missing Middle Housing Initiative will not solve every issue, it cannot completely mitigate every concern, but – on balance – there is more than enough evidence that this policy will make a positive difference. In the context of the current housing crisis, there is more than enough justification to give it a chance to work.

It does make sense to monitor it, to evaluate it. In the future it will probably make sense to modify, enhance, or amend it in some way.

What does not make sense is sending it back for further study or review, to making last-minute amendments, or further delaying it because some people claim it isn't quite perfect or have neglected their many opportunities to learn more about it.

Now is the time to vote in favour of this initiative.

Thank you!

On Wed, Aug 3, 2022 at 10:14 AM Public Hearings <[PublicHearings@victoria.ca](mailto:PublicHearings@victoria.ca)> wrote:

Good morning,

Thank you for your email.

As there is a Public Hearing scheduled for this initiative, we are required to present all correspondence received by Mayor and Council on the agenda as it becomes part of the public record and meeting materials. We are unable to share your correspondence solely with Mayor and Council via email.

Based on this information, please advise if you would like your correspondence to be included on the agenda or replaced with a new email. If we do not hear from you before Thursday, August 4 at 2:00 p.m., we will not publish your correspondence to the agenda.

Thank you,

**Public Hearings**



Legislative Services

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

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**From:** John-Michael McColl [REDACTED]  
**Sent:** August 2, 2022 8:23 PM  
**To:** Victoria Mayor and Council <[mayorandcouncil@victoria.ca](mailto:mayorandcouncil@victoria.ca)>  
**Subject:** Following up on my message to Mayor and Council

Hello!

So this was my first time e-mailing mayor and council.

I didn't realize that my email would be published on a public agenda - and I would not like my message to appear on the public record in that way. Too many typos!!

Could I ask that my message be forwarded to mayor and council for their consideration without being published on a public agenda?

My original message is related to the Missing Middle Housing initiative and was emailed to Mayor and Council just after 2PM on August 2nd.

Thanks for your help!

John Michael McColl

On Tue, Aug 2, 2022 at 6:16 PM Victoria Mayor and Council <[mayorandcouncil@victoria.ca](mailto:mayorandcouncil@victoria.ca)> wrote:

Thank you for your email, we appreciate hearing from you. Your comments will be forwarded to Mayor and Council for their information. Your email will also be referred to staff for review, who will provide a detailed response where required.

**Please note:** If you are emailing to provide your input on a development item going to a Committee of the Whole or Council meeting, your email will be published on a public agenda for Council's consideration. If you are providing input on an item going to a Public Hearing, your email will be sent directly to [publichearings@victoria.ca](mailto:publichearings@victoria.ca) to be published on a public agenda for Council's consideration.

Information regarding any development application is available on the City's [Development Tracker](#). Public Hearing dates are posted on the [Public Notices](#) page of the City of Victoria website.

*If your email relates to a development item that has been the subject of a Public Hearing that has already closed, Council is unable to receive further input and your message will not be shared.*

Thank you for taking the time to write, we hope you will continue to stay engaged on City matters in the future.

**From:** Jeremy Schmidt [REDACTED]  
**Sent:** August 3, 2022 9:14 PM  
**To:** Public Hearings; Victoria Mayor and Council  
**Subject:** Letter for the MMHI hearing

Mayor and Council,

I thought it might be important to first note that the city recently passed the Rapid Deployment of Affordable Housing (RDAH) Bylaw at a public hearing in April 2022, which has been in the council pipeline since 2020. I believe it flows from phase 2 of your 2018 Housing Strategy. The change allows non-profit, public developers, and co-ops to have their rezoning and development permit applications with or without variances delegated to staff if:

- 1) they are proposing a rental building in perpetuity, and
- 2) the application complies with the OCP and design guidelines.

You are also embarking on some other important projects this year: the Rental Incentives project, which incorporates looking at stronger tenant protections, rental tenure zoning, and the Village & Corridor plan phase 1 (passed July 14). The Village & Corridor plan identifies new areas for purpose built rental housing and the rental tenure zoning component will hopefully pre-zone for rental housing in villages and along corridors. The corresponding Rental Incentives project is looking at what type of permissions and bonuses need to be provided in order to permit displaced tenants to return at their previous rents.

It is within this grander policy context that I assess the merits of the Missing Middle Housing Initiative (MMHI).

I agree that we need to tax land lift, especially in a spot rezoning system, but I also think that we need evidence to inform what that land lift is and then create policy to respond to that evidence. While there are no studies yet that I have seen assessing land value impacts of \*broad\* rezoning, I think there is a general assumption that [the broader you go, the more it can mitigate land lift](#). Land lift resulting from spot rezoning is going to be significant, and then a spectrum exists as you go to the opposite extreme. I also think it is relevant that the MMHI is unlikely to attract large scale developers - the Starlights of the world - who can afford to land bank like we saw happen in Chicago when they upzoned a small number of high density parcels around transit corridors (Freemark, 2020). This is because only 3-storays and a maximum of 1.1 FSR is contemplated for missing middle forms, which is consistent with the [existing permissions](#) in the 2012 Official Community Plan for Traditional Residential Neighbourhoods:

Traditional Residential	Ground-oriented buildings up to two storeys. Ground-oriented buildings up to two and one-half storeys may be considered for certain infill housing types, as indicated in the Victoria West and Fairfield neighbourhood plans. Multi-unit buildings up to three storeys, including attached residential and apartments on arterial and secondary arterial roads, and in other locations indicated in the Victoria West and Fairfield neighbourhood plans.	Houses with front and rear yards, with variable setbacks, oriented to face the street. Variable landscaping and street tree planting. Small apartments and local retail stores along arterial and secondary arterial roads, at intersections, and pre-existing in other locations. On-street parking and individual driveways.	Ground-oriented residential including single, duplex and attached dwellings. House conversions. Accessory residential such as <a href="#">secondary suites and garden suites</a> Freestanding commercial at the intersection of major roads. Low-rise multi-unit residential and mixed-use along arterial and secondary arterial roads. Home occupations. Limited local-serving commercial uses considered in limited locations identified in neighbourhood plans.	Total floor space ratios up to approximately 1:1. Additional density may be considered where appropriate in certain limited areas in the Victoria West Neighbourhood up to a maximum indicated in the Victoria West Neighbourhood Plan.
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The MMHI is set to only apply to Traditional Residential parcels, which make up approximately 65% of our residential land here. The effect then is that the MMHI is aligning zoning with the permissions that already exist in the OCP, and which were established in 2012 - 10 years ago. I believe this has been a greatly underappreciated point in the debate around the MMHI and land value impacts.

Staff have raised this point numerous times during committee meetings, noting that it was an important part of their discussions with BC Assessment about land value impacts. The Director of Planning said that in their consultations with BC Assessment, they advised the city that the MMHI permissions would to an extent already be baked into land values because they do not propose going beyond what the OCP and design guidelines already contemplate for height, density, site coverage, and setbacks on the impacted parcels.

The updated zone will permit the following uses:

- 1) Single Family Dwelling (0.5 FSR)
- or
- 2) six-unit houseplex (0.5 base FSR)
- or
- 3) corner lot townhomes (0.5 base FSR, up to 12 units, but will depend greatly on lot size)

I believe another underappreciated aspect of the land value debate is that uses 2) and 3) come with a number of parameters that are not required for 1). This has the effect of putting downward pressure on the land value for uses 2) and 3), in addition to the aforementioned OCP aspect. For instance, the missing middle forms will require:

- At least one adaptable unit
- Off-street accessible parking
- A minimum number of 3-bedroom units (lower profit margin compared to 1+2bdrm)
- Bike parking, including for oversized bikes
- Bike maintenance facilities if greater than 6 units
- Dedication of land for public right-of-ways
- At least one secondary suite must be built
- Development Permit fee
- \$10/sq ft density bonus up to a maximum 1.0 FSR (HP)
- No greater site coverage permission than SFH
- 40% open site space requirement
- setbacks consistent with SFH

These are only requirements that apply to missing middle forms and not SFH, which provides an economic advantage to SFH within the zone. I think it's fair to say that these constraints put downward pressure on the potential land value increase going from 0.5 FSR to 1.1 FSR. All of the above parameters add expenses that are otherwise not required if you proceed with a SFH re-development. This creates a risk where SFH builders can afford to outbid missing middle builders on many parcels, which would defeat the purpose of allowing more forms in traditional residential neighbourhoods.

I do not believe the economic consultant's findings are prima facie far off in terms of estimating that there will be little or no land lift when all of the constraints of the missing middle proposal are considered, and taking into account that it is not proposing to go outside the bounds of the 2012 OCP.

In the event that the predicted equilibrium of the MMHI is off, city staff have embedded a reporting back aspect to the MMHI, wherein there will be an official report back in 2 years time, but it also provides that as soon as any unintended consequences are observed, they will come back to council with remedies sooner than that. Council could consider making this report back time 1 year, but it is unlikely that significant missing middle construction will have commenced over that short time.

Over the years I have seen this report back mechanism work as ordinary updates and remedies to bylaw changes have happened at the city. I would also suggest that most public policy undergoes amendments over time in response to public servants seeing the impacts of policy play out. It is hard to achieve policy perfection on the first attempt, and land economics and market conditions are not static.

I do not believe the MMHI is a perfect policy, but I believe that when it is considered within the context of the city and its grander housing policy work, it boils down to a question of:

- 1) Continue to allow nothing but single family dwelling re-development by-right on 65% of our land, where no value is captured for public benefit and there are no tenant protections, or
- 2) Allow houseplexes and townhomes to be built on those same parcels, which will be marginally more affordable, allow more people to live close to jobs and amenities, and will provide payments to the housing reserve fund to fund housing projects for low-to-moderate income folks or directly provide below market units.

There is a conundrum wherein the City does not have the authority to regulate tenant displacement in by-right development scenarios, which is why there are no tenant protections covering 65% of our residential land base (traditional residential zones) currently.

Councillor Potts and Mayor Helps did helpfully find a work around of sorts for the MMHI, but it's not a long term solution. I understand that if missing middle forms get built and the builder complies with the City's tenant assistance policy, then their development permit fee, or some portion of it, gets refunded. I believe this was unanimously supported at council earlier this month.

Council also motioned to increase the development permit fee to \$10k for houseplexes and \$13k for townhomes to increase the incentive for compliance. This is obviously not a long term solution, but it is important to note that this is not a problem created by the MMHI. Mayor Helps also wrote to David Eby as part of the MMHI encouraging him to empower municipalities to regulate tenant displacement in circumstances where no rezoning is required. [David Eby recently signalled](#) that he wants to pursue universal tenant protections in the Province.

As noted previously, the MMHI also mandates that projects include at least one suite. We know from data at the city that despite suites being allowed by-right now with SFHs, there is barely any uptake. Between 2004 and 2017, there were 27 total applications for garden suites in the City. Since delegating approval authority to staff in 2017, there have been a total of 180 applications, 70% of which were approved by staff. Relying on homeowners on 65% of our land to voluntarily build suites is not working.

There have been a lot of calls for the City, as an alternative to the MMHI, to work with non-profit and public developers on a solution. While it is hard to disagree with this sentiment, I think it must be considered that non-profit and public developers are not in the business of building 3-storey projects at 1 FSR. I have never seen an application from such a stakeholder come to council. The smallest projects I have seen from non-profits and public developers are probably 4-storeys and 50+ units. This was the conclusion that the city and those stakeholders arrived at as part of consultations for the MMHI:

*Within the context of Council's direction to "continue to focus on finding innovative approaches to create new affordable rental, coop and affordable ownership housing units," staff convened a workshop with non-profit housing providers in the region to explore opportunities for missing middle housing to better enable affordable housing. The workshop revealed that current funding programs for affordable housing push non-profit housing providers to prioritize projects containing higher quantities of smaller units than would be common in missing middle housing forms. Additionally, the high cost of land in Victoria is such a significant barrier to affordable housing projects that, when this barrier can be overcome (e.g., publicly purchased or donated land), it is usually for projects of greater scale than what missing middle zoning could allow. Despite this, participants from the non-profit housing community emphasized that making it easier for the market to supply these scarce forms of housing (especially three-bedroom homes) for those who can afford them is critical to a healthy housing ecosystem. Over time, new attainable housing forms can increase affordability*

Co-ops may be more feasible with the newly announced Federal funding, and they will become an option if MMHI passes.

There is also no realistic pathway to allowing high density projects in Traditional Residential zones where low density housing currently exists. The MMHI bridges that gap on parcels where non-profit and public developers are not going to be building housing anyways. In my view, the city is doing what it can, aside from providing more land, through its new

RDAH program by providing city-wide advantages to non-profit and public developers. Even if the city did a better job of providing land, it would not be economical to acquire land in low density neighbourhoods for non-profit or public development to build 1 FSR projects.

While density alone does not necessitate that something will be affordable, you cannot achieve affordability without density. I would support an alternative approach to Traditional Residential Neighbourhoods that sees non-profit and public developers allowed to build whatever height and density is necessary to achieve affordability. However, this is unlikely to be accepted by the city even though I think it is justifiable. Given the fact this is not a realistic pathway, MMHI is a good step in the right direction to make more space for people in Traditional Residential Neighbours, many of which are losing population and losing infacts (2016-2021 census comparisons via Census Mapper.)

I believe all of this context is important when assessing the value, or lack thereof, of the MMHI, since I do not believe there is an alternative in which non-profit developers are building in Traditional Residential zones unless we start slowly eroding the borders of those zones (which again I am all for, but I'm not sure that's a political reality anytime soon.) Even then, it would not address the heart of Traditional Residential neighbourhoods for a very long time. I believe that anyone who is proposing that we instead promote non-profit housing in these neighbourhoods needs to grapple with this context and explain what that pathway looks like because those stakeholders themselves have identified it's not a density that falls within their scope. I believe the pathway is for the City to do A + B + C + D, not A or B or C or D. The MMHI does not meaningfully risk excluding non-profits from competing since they are not likely to compete in Traditional Residential neighbourhoods whether the MMHI passes or not.

We heard last week at the 11 Chown Place hearing from a senior's non-profit housing provider how difficult it is for them to build economically sustainable housing without significant density. Please listen to these stakeholders who know this work and understand that non-profit and public development is not a realistic pathway for progressing traditional residential neighbourhoods at this time. Right now, MMHI is our best pathway towards making those neighbourhoods more inclusive, even though it is only incremental.

As it stands, there are modest affordability provisions built into the MMHI and a number of constraints that do not add to affordability, but that come with costs to missing middle housing providers and are still benefits to the public (accessible parking, adaptable units, etc). As I have set out, I believe all of those constraints put downward pressure on the missing middle land values and the findings of marginal viability are likely not far off as a result. I do not think on its face it is wholly unreasonable to try out the current iteration of the policy. We will know in time if we have missed the mark on land value capture and the council can amend accordingly. One lesson I learned from the infill lead planner in Kelowna earlier this year is that it is really difficult to anticipate with precision how the market will respond to policy changes and that is why monitoring and reporting back is a key feature.

Despite my view that council should get a baseline missing middle policy passed this term, I think there will be a number of improvements that council could make to the MMHI in the future (other changes like tenant protections needs to come from the Province) as staff learn from the policy implementation. Another idea outside of council's direct control is to explore changes to the building code with the Province to legalize Point Access Blocks, which are legal in most countries around the world up to 10 storeys, but only up to 3 storeys in Canada. Single stair/elevator buildings - small apartments - produce more livable floor area per sq ft of buildable space and can be built far cheaper. It would be a great addition to the MMHI suite of options. As I understand it though legalizing this form is not within council's direct control.

Lastly, I think it bears repeating that the best evidence we have says that [new market rate housing does not make rents in the area more expensive](#). Additionally, the fears about taxes going up do not appreciate how property taxation works. If your home assessment goes up 20% in a year, but so does all of your neighbours, then [you will continue paying the same amount of tax](#). This is why it is in fact important that we do not proceed with MMHI by only targeting a select few parcels at a time because that would create scarcity and major discrepancies in assessments within areas.

Please pass the MMHI.

Jeremy Schmidt  
Vic West Resident

[REDACTED]

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**From:** Jack Sevigny [REDACTED]  
**Sent:** August 3, 2022 10:03 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative

To whom it may concern,

I'd like to express my support for the MMHI. I believe it'll be an effective means of lowering property values. I would also like to see it go further, including incentives for rent control and mandatory affordable housing in new developments.

I believe questions of neighbourhood character being challenged by mid-density buildings are unfounded. Victoria has never been a cookie-cutter suburb with a well-defined look that should never be strayed from. We already have dozens of mid-density buildings in almost every neighbourhood of the city. Subdivided century homes with converted carriage houses abound in Fernwood. Downtown's most enjoyable streets are lined with colonial era brick and mortar walk-ups. Multi-unit apartment blocks can be found over every cafe and corner store in Harris Green.

Mid-density housing *is* absolutely Victoria.

We can have conversations about how effective it'll be in addressing the housing crisis, what the review process should be for ensuring townhomes, rowhouses, and multiplexes fit into the architectural styles of their blocks, and all the other little nitpicks people may have, but those conversations are moot until we are able to offer all types of housing in Victoria, especially mid-density housing.



**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:48 AM  
**To:** Public Hearings  
**Subject:** FW: Input - Missing Middle Housing

**Importance:** High

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**From:** Joanne Thibault [REDACTED]  
**Sent:** August 3, 2022 12:39 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Input - Missing Middle Housing  
**Importance:** High

Hello There;

As a resident of James Bay I would like to provide my input to assist Council in deliberating and deciding on the proposed Missing Middle Housing initiative.

1) James Bay is quite a mix of multi-storey buildings cheek and jowl to heritage style single family dwellings, many that are already house multiple units. To me, the Missing Middle Housing initiative will help James Bay retain more of its heritage style single family dwellings rather than multiple heritage style dwellings being demolished and replaced with multi-storey buildings. While I think the horse has already left the barn on my street (Rithet) with two of the remaining three single family homes slated for demolition to house a multi-storey condominium, there are many areas of James Bay where the Missing Middle Housing initiative will provide just the incentive needed for conversions for housing instead of demolitions for housing.

2) The importance, to me, of doing everything possible to encourage the type of housing supported by the Missing Middle Housing initiative is that the green space associated with these converted dwellings will remain while inside the housing footprint, more housing is made available. One just needs to look at the proposed 5 storey CRD affordable housing development for 131 to 139 Menzies St to understand the large swath of greenery that will be replaced by a stark, economical concrete building butting up tight to the street front. There isn't even the redemption of James Bay urban storefronts being accommodated on the main floor of this building that would at least allow our urban village to flow unimpeded. Without the Missing Middle Housing initiative there will be far, far too many 131 to 139 Menzies St type developments overwriting our heritage style neighborhood. The desperate need for CRD affordable housing may trump the loss of greenery and the staunching of our urban village, but it is essential that this win-lose not proliferate. The Missing Middle Housing initiative will assist greatly in this protection.

3) From personal experience working with a single family dwelling property owner looking to add a modest amount of housing through whatever means were feasible, the Missing Middle Housing initiative greatly expands the realm of the possible and increases the likelihood that a plan and design can be found that is feasible. The owner's interest is modest additional housing for retiree friends and family and being enabled to offer this fills a very important housing need.

4) Something that is philosophically important to me is equitable distribution of housing throughout all areas of Victoria in order to meet demand that will never subside owing to the fact that we live in one of the most desirable parts of the world. Special kudos to the 33km bike network for adding even more to our desirability! I do not believe that any one area should be exempt from providing a share of housing to meet demand. Nor do I believe that any one area should be burdened with sacrificing all of their single family dwellings, and their attendant greenery, to accommodate all of the multi-storey buildings. The Missing Middle Housing initiative is a powerful lever to more evenly distribute additional housing throughout all areas of Victoria, thereby helping to avoid the loading of multi-storey buildings onto one area.

Many thanks for considering my input, Joanne

Joanne Thibault  
401-545 Rithet St  
Victoria, BC V8V 1E4



[REDACTED]

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**From:** Kyla Boan-Mitchell [REDACTED]  
**Sent:** Thursday, August 4, 2022 9:47 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative

I'm writing to express my strong support for the Missing Middle Housing Initiative. Victoria has fallen behind when it comes to attainable and livable housing options and this initiative will be a huge step towards closing that gap. Increasing the supply of multi-unit dwellings will benefit the city by lessening the strain of concentrated condo densification downtown by expanding into the surrounding neighbourhoods. Diversifying the housing options in those areas will also serve a wider cross-section of Victoria's population than can currently afford the small supply of single family homes in those areas.

I am in my early thirties and many in my age range are starting families and leaving Victoria due to the lack of housing options.

Kyla Boan-Mitchell  
909 989-Johnson St. Victoria

**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:48 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Public Hearing Aug 4th

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**From:** Karen [REDACTED]  
**Sent:** August 3, 2022 12:59 PM  
**To:** Public Hearings <PublicHearings@victoria.ca>; Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Missing Middle Public Hearing Aug 4th

Hello,

I am unable to attend the public meeting on Aug. 4th on the Missing Middle Initiative. Please ensure council is aware of my thoughts.

I am requesting council does NOT approve the Missing Middle Initiative or at the very least delay approval until after the election for the following reasons:

- Missing Middle does not provide affordable housing. There are claims it might pave the way or trickle down economics might help. For addressing our critical housing issue can we rely on these unknowns?
- Where are the options? I am hearing about cities like London Ontario implementing rules to limit the use of airbnbs to homes where people live and are there at the time rented. I think this will produce more housing stock much faster than the missing middle initiative. Affordable suites in my neighbourhood are being used as airbnbs.
- Where is the risk mitigation plan? for example Where is the speculation mitigation strategy?
- Where is the integration with broader municipal and provincial policies for key infrastructure issues?
- No clear strategy for renters. The recent rental protection idea is in the study phase with too many unknowns.
- Holding a public meeting on Aug 4th after a summer long weekend. Does council really care about the public input?

Given the cooling of the market, inflation, higher interest rates, labour shortages and supply chains issues why would you approve now when there are many more unknowns? More thought and work is needed this initiative is incomplete.

Thank you for taking the time to read.

Karen Dellert  
15 Cook St (not a single family house, a multi family house with long term rental)

[REDACTED]

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**From:** Ken Reimer [REDACTED]  
**Sent:** August 3, 2022 5:09 PM  
**To:** Public Hearings  
**Subject:** Missing Middle submission for August 4th Public Hearing

To City of Victoria Council and Staff

We are writing to share our concerns regarding the Missing Middle (MM) proposal.

Firstly, we respectfully acknowledge that we are writing this from the territory of the Lekwungen speaking people, known today as the Esquimalt and Songhees nations whose historic relationship with the land continues today.

We are concerned that the MM proposal will result in an overall increase in housing costs as older homes are destroyed to make way for new multi-plex/townhome developments. New housing costs are typically higher than the costs of older housing. We believe that the MM proposal will not provide reasonable options for families, but will instead result in overall increases in housing costs. For example, when the city of Kelowna implemented a MM policy, houses worth approximately \$1.m were torn down and replaced with 6 townhomes each costing \$1.m. Increasing density does not result in lower housing costs, simply the opposite. The cities with the highest density in Canada, Vancouver and Toronto, also have the highest housing costs. There is no reason to expect that increasing the density of Victoria will produce a result that is different from other cities with higher densities. Middle income families will not benefit from the housing that will be created by the MM policy. The townhomes will end up costing the same as an older single family home, but won't have the backyard space for kids to play, or the front yard driveway so often used for basketball and hockey. The townhomes will most likely be purchased by those without children living in the home, which is not our understanding of the intended purpose of the MM policy.

The proposed 0.15 parking spots per dwelling is woefully inadequate and simply misguided. While we understand that the ultimate goal is for residents to establish car light lifestyles, the majority of homes in our neighbourhood have two vehicles and this is unlikely to change anytime soon. Each dwelling should, at minimum, have 1 parking spot and those spots should be required to include charging infrastructure for electric vehicles. In addition, the MM policy should consider a strategy to develop curb-side charging directly linked to each new dwelling. If the MM policy is approved, it should include a strategy to begin to implement curb-side charging in residential areas.

We believe that the MM policy will result in a reduction of lower cost rental housing. Intuitively, it will be older homes that are destroyed to make way for the newer housing complexes and it is within older homes that we see lower cost rental units. The MM policy will further gentrify Victoria and adversely impact the availability of lower rent housing.

There is nothing in the MM policy that outlines the need for greater infrastructure services as a result of densification. If the MM policy results in a significant increase in housing density, additional infrastructure will be required including: public works, policing, health care, public transportation, emergency services and possibly space in public schools. A strategy for increasing the overall infrastructure in Victoria is required before the MM policy is approved.

It should also be noted that, encouraging the densification of housing in an earthquake zone seems to be irresponsible. The city needs to redevelop its emergency response strategy with the increased density in mind and ensure it has a plan to increase emergency services in concert with the increased population expected if MM policy is approved.

We were surprised by the lack of direct tangible benefits within the MM policy for the nations whose land this policy pertains to. Not having a direct and tangible benefit for the Esquimalt and Songhees Nations is a missed opportunity for reconciliation and council should send the MM policy back to staff for inclusion of a section on reconciliation.

Lastly, we believe it is irresponsible for this council to approve the MM policy as many of the current council members are not running for re-election. We believe that the MM policy should be either voted on as part of the upcoming municipal election or left for the next council to decide.

We appreciate the opportunity to provide our comments on the Missing Middle policy proposal and hope that council votes to send the policy back to staff for improvements and consideration of the new council.

Ken Reimer & Kathy Buettner

164 Cambridge Street

Victoria BC V8V 4B3

[REDACTED]

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**From:** LP [REDACTED]  
**Sent:** August 3, 2022 6:45 PM  
**To:** Ben Isitt (Councillor); Charlayne Thornton-Joe (Councillor); Geoff Young (Councillor); Jeremy Loveday (Councillor); Marianne Alto (Councillor); Lisa Helps (Mayor); Public Hearings; Sharmarke Dubow (Councillor); Sarah Potts (Councillor); Stephen Andrew (Councillor)  
**Subject:** MMHI Public Hearing - August 4th.

Dear Mayor & Council,

- 1) The MMHI, in its current form, will not meet its objectives.
- 2) From what I have read, many of those who have written in support, do not understand the policy and think it will, in some way, help their housing situation by creating some form of "affordability" or "trickle down" effect - it won't.
- 3) As the city has admitted that the policy is not about "affordability", all letters in support that cite "affordability", should be disregarded.
- 3) This council is an outgoing body and should not be making the decision on such an important policy.
- 4) This appears to be something Lisa Helps feels the need to force through as her legacy before she leaves, with no regard for the potential damage it could do.
- 5) It's no wonder that this council scored so low on the governance review - this is a perfect example of the behaviour that has resulted in such a poor score.

Sincerely,

Lynn Phillips

[REDACTED]

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**From:** Mandi Storey [REDACTED]  
**Sent:** August 3, 2022 5:31 PM  
**To:** Public Hearings  
**Subject:** Missing Middle

Hello

I would like to state my support for the project Missing Middle in The City of Victoria considering to amend its zoning bylaws and official community plan to make it easier for owners & developers to build townhouses and houseplexes to help address the lack of housing options for families and help Victoria prosper.

Thank you

--

**Mandi Storey**  
**Tutoring with Mandi**  
(she/her)

[REDACTED]



[REDACTED]

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**From:** Marnie H [REDACTED]  
**Sent:** August 3, 2022 4:17 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Public Hearing input

Dear Mayor Helps and City of Victoria Councillors,

I am unable to personally attend tomorrow's Missing Middle Public hearing. I have read a lot of the literature surrounding it. I listened to the pre meeting presentation online on July 12, 2022.

I do not support this initiative. I have some serious concerns about it. I would like it to go forward to the next council. I think more time is needed to fully look at it. There are several unanswered questions and what ifs still. Changing the whole look of the city and areas in which people currently live is a very big undertaking and one that should not be rushed.

Some areas of concern:

- these new homes will still be out of reach for most people wanting to enter the housing market. Missing Middle Townhomes will likely cost \$900,000+. First time home owners earning \$125,000 can afford a \$500,000 mortgage. These homes are out of reach for the majority of residents living in Victoria and the CRD. There needs to be better solutions. I feel the only ones truly benefiting are the developers building them. Many will only be 2 bedrooms and not for families again changing the look of the existing neighbourhoods.
- there is no exact outlook as to how many of these homes will be built and what neighbourhoods will look like.
- our roads and infrastructure are already overloaded with the number of people living in the area.
- There will be no space for cars on the streets as the housing does not require parking.... we are assuming all with car share and ride bikes. I do not want to see a San Francisco parking scheme. Where you have to park km from your home or have timed parking out front.
- I do not like that once this is passed residents will not have a say on what goes up beside them. It will be totally up to the city and staff. We have community plans and zoning for a reason. People who bought homes in the past will not have any idea of what the future will look like beside them. No sun, houses right in view of all windows, no green space between homes, trees gone or moved, increased traffic, etc. You could end up the little house stuck between two huge 3 plexes.
- there is no real thought into whether it will actually bring more doctors, nurses, tradespeople to the area. We do not control who will buy these homes. It might just create the need for more and more of these people and tax our system even more. Our hospitals, fire departments, etc are already stretched to the limit. Do we have enough room in schools? Do we have the sewage, water and hydro infrastructure for more and more people? Do we really need more and more people?

This is not the direction I want our city to go. I do not think enough thought has gone into it. So many unanswerable questions. I do not want to be the test subject with something like this going up beside my home to see how it goes. Let's take a breath and do some more research. Let's see if this is really what homeowners want beside them. Let homeowners have more say in the future of their neighbourhood.

I am also worried that a lot of these developments will be owned by large corporations in the end, who will just be benefiting from getting the rent from people and thus still not allowing people to own a home.

I feel having all of this take place so quickly before the current council leaves, during the summer when most Victorians are disengaged is not ideal.

Thanks for listening and taking things into consideration.

*Marnie Hare*

[REDACTED]

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**From:** Susan Czypyha [REDACTED]  
**Sent:** Tuesday, August 2, 2022 4:05 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

I am writing in to say “vote yes to missing middle” for the following reasons:

- a lack of housing diversity and family friendly housing is pushing families out of Victoria, contributing to sprawl and traffic issues.
- requiring rezoning for modest density increases adds years of time and thousands of dollars which only disincentivizes triplexes to 6-plexes and townhomes from being constructed and makes them more expensive than they need to be.
- we already allow single family homes to be torn down and rebuilt with no requirement for tenant protection, no increase in units, no thought to “form and character” of the neighborhood, and no requirement to maintain green space (just open space, which can be paved) items that are considered in the mmhi strategy
- While missing middle isn’t “affordable”housing, it gives options to the people who don’t need or qualify for low income housing options but can’t afford the \$1.2+++ needed for a single family home
- it is one piece in the housing strategy that is working to address a huge challenge, and it works in tandem with other strategies
- lastly, I want there to be a chance my grandkids could live in Victoria if they chose, and if we continue to restrict housing options, it significantly reduces the likelihood of them being able to stay here

We live in a suite in my daughter's home and it is ideal. We have our own private space but close enough to be able to help out with the kids as needed.

I would love to see more 4 or 5 unit buildings scattered throughout our neighborhoods. We desperately need housing options that fall between a high rise condo and a single family dwelling.

Please help to grow the communities in a way that keeps the atmosphere of the small towns within the city walls.

Sincerely,  
Susan and Peter Czypyha  
1142 Summit Ave.  
Victoria BC  
[REDACTED]

[REDACTED]

---

**From:** Ronald Bell [REDACTED]  
**Sent:** August 3, 2022 7:25 PM  
**To:** Public Hearings  
**Cc:** [REDACTED]  
**Subject:** FW: Missing Middle Initiative - Stop It Now and Leave It For the Next Council

For Aug 4<sup>th</sup> Public Hearing

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**From:** Ronald Bell [REDACTED]  
**Sent:** August 3, 2022 7:22 PM  
**To:** mayorandcouncil@victoria.ca  
**Cc:** [REDACTED]  
**Subject:** Missing Middle Initiative - Stop It Now and Leave It For the Next Council

Dear Mayor and Council,

I am very distressed with Missing Middle Initiative.

First, from what I have read the initiative is mis-conceived. The elimination of single-family zoning cannot create affordable housing but is just an invitation to developers to destroy the City's residential neighbourhoods.

Second, the process has been marked by deception and misinformation. The proposal shifts without proper notice and is being pushed ahead without the opportunity for proper consultation. Such a massive change to the City's structure needs much more notice to residents to let them know what the real ramifications are and to give them a real opportunity to consider and respond. Administrative fairness requires proper disclosure to those whose interests are affected. Given the magnitude of the proposal, this means each residential property owner should be getting written notice of the intent to rezone their property, and their neighbour's property to allow multiplex housing.

The proposed rezoning is not being requested by the property owners who are going to be affected but is being imposed on them. This is an extraordinary step that should only be taken, if taken at all, after extensive and meaningful consultation to obtain the consent of those whose are directly affected.

The process currently being pursued is a travesty. It is the first summer in two years that people have been able to travel and visit families. As well school is out, and parents have more demands on their time: being with their children and keeping them occupied during the vacation. Pretending that people can effectively engage in a consultation process this summer shows a total lack of regard or concern about public input. Continuing this process during the summer illustrates the problems identified in the recent Governance Report: you are pursuing your personal agendas without regard to the public interest.

Third, in the past the City had a Community Plan that meant something; not the least of which was being the ability to live in the City knowing what sort of community you were going to live in. Once again, this Council is demonstrating a complete disregard for the Community Plan, and for all the work and effort over the years that created the Community Plan.

Mayor and Council: pushing this Initiative through is a disgrace to the democratic process. You were elected to act on behalf of all citizens in the City, not to implement your own private agendas.

This Initiative should be stopped now, and the issue left to the next Council to consider.

Regards,

Ronald Bell  
1005 Pentrelew Place  
Victoria, BC V8V 4J5



[REDACTED]

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**From:** Robin Jones [REDACTED]  
**Sent:** August 3, 2022 8:52 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

One of my main concerns is the removal of trees in the building envelope as well as trees that are not considered protected trees. It is false to say the city is planting 5000 trees when the city is allowing so many to be removed during housing development. When a developer removes trees, that number should be added to the 5000 tree number. Also developers should be required to replace all trees removed if not on their property , to parks , boulevards in the immediate area near the development.

Regarding the Missing Middle, every new development whether 4 units or more, should be required to have 1 or more permanent rental units.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** August 3, 2022 8:51 PM  
**To:** Public Hearings  
**Subject:** Missing middle

City council:

This email is to inform you of my opposition to rezoning of the current residential zoning to allow for missing middle housing.

As a long time Victoria renter, I have grave concerns about the rental affordability for existing renters with this proposal. We need to address more rental opportunities for rents geared to income. According to BC Housing, the definition of affordable is 30% of your income.

This is what is needed for everyone to be housed.

Why is this even a problem?

More subsidized housing!!!

Sincerely,

A concerned citizen for affordable housing for all.

[REDACTED]

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**From:** Stephen Hayward [REDACTED]  
**Sent:** August 3, 2022 6:27 PM  
**To:** Public Hearings  
**Subject:** RE: Missing Middle Initiative, August 4th Public Hearing

Dear Mayor and Council

As you would be well aware, pursuant to section 115(a) of the *Community Charter*, the primary responsibility of municipal councillors is “to consider the well-being and interests of the municipality and its community”. And, per section 116(2) “In addition to the mayor’s responsibilities as a member of council, the mayor has the following responsibilities: (a) to provide leadership to the council, including by recommending bylaws, resolutions and other measures that, in the mayor's opinion, may assist the peace, order and good government of the municipality”.

In this context “A municipality is a corporation of the residents of its area” (see 6(1) of the *Community Charter*). In other words, **ALL** residents. Not just those who find housing to their liking unaffordable in Victoria. (Incidentally and obviously, this issue exists in every city in the world and always will.)

The “missing middle initiative” now before the mayor and council is not “in the interests of the municipality and its community.” It is only designed to benefit a small minority, and to entirely remove public consultation prior to approval of development in many instances. And, what is still more galling is that it isn’t even clear if even the objective of providing more affordable housing stock could actually be achieved by it, and if so, to what tangible extent, if any. This whole initiative is based only on speculation. Further, as was so blatantly illustrated by the City’s responses to the many questions posed by Susan Simmons in her July 11, 2022 email to you, you haven’t bothered to even consider the potential adverse impacts of it on a myriad of other matters critical to the livability, safety, health and economic viability of our capital city. That is bad governance in the extreme.

This initiative, if proceeded with, would totally change the whole of Victoria forever, in primarily negative or entirely unforeseeable ways. It is unconscionable for a mayor and any councillor who is not seeking re-election and the other members of council who may very well be looking for other jobs in ten weeks, to pass such drastic measures now. If the next mayor and council still feel that this should be advanced, then leave that to them to pursue after more careful thought and public input.



Regards,  
Stephen Hayward  
589 Toronto Street

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:48 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Public Hearing August 4th

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**From:** Samantha Hulme [REDACTED]  
**Sent:** August 3, 2022 12:31 PM  
**To:** Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>; Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Ben Isitt (Councillor) <BIsitt@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>; Public Hearings <PublicHearings@victoria.ca>  
**Subject:** Missing Middle Public Hearing August 4th

First off, we support attempts at increasing both affordable housing for low income people as well as the "missing middle" population. We have written to Council and the city managers about the proposed development at Kipling street multiple times over the last number of years (see most recent email below). We are not opposed to multiple units on traditional single family home lots - but development must be pursued with respect to existing neighbourhoods and taxpayers perspectives. We in fact live in 1 of 3 homes that were built 23 years ago on a long lot with one 100 year old rancher style home. The development of our homes included and respected community input and were built in character with the neighbourhood.

That said, holding an important public hearing in the middle of summer and during the BC holiday short week when many, many people will not be in town is grossly unfair and would seem like an attempt to tick the public consultation box without really wanting the tax paying public's input.

The issue of the missing middle and future developments is an Election Issue and should be discussed during the campaign and a public consultation held after the election.

With the greatest of respect, this council does not have a mandate at this time to make any decisions about this issue, according to your own commissioned study as to your approval rating - you have lost the trust and confidence of most of the Victoria population who do not feel you are representing the will of residents.

We were very disappointed that this Council deferred a decision on our community Brooke Park dog hours pilot project request until after the election. Again, with respect, if Council felt ill equipped to decide something as simple and uncontroversial as a pilot project for off leash hours at a neighbourhood park where such had been the practice for decades, how is it possible that they feel they can adjudicate over the largest land use decision in a decade - 2 months before an election, with a 25% approval rating.

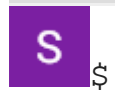
Please defer any decisions on new affordable housing and the missing middle proposals until after Victoria residents have chosen a new Council and new consultations can begin when residents are back in town from summer holidays and related activities.

Thank you,

Samantha Hulme  
1404 Brooke St

# Townhouse development at 349/351 Kipling/1400 Fairfield

Inbox



**Samantha Hulme** [Redacted]

to planandzone

View { rlsywi\$izipstq irx\$78=3795\$On park35844\$Tenvjrn\$

Joanna Fox, Chair David Molinski, Vice-Chair Land Use Committee

I am writing again to oppose the development proposal for 1400 FAIRFIELD RD, 349 KIPLING ST, and 351 KIPLING ST significantly impacted by its development.

We have participated in previous community consultations about these properties, when originally proposed modern townhouse complex.

While it appears now that the new proposal is an altered design more in keeping with the neighbourhood character site and neighbourhood. Again, the design is much too tall and not in keeping with the neighbourhood character greenspace.

We still hold concerns related to increased traffic (already now an increased problem on Kipling/Fairfield/Durham) the playground, dwarfing the neighbouring properties and eliminating their sunlight for much of the day/evening.

6 townhomes at a consistent height with the neighbourhood, including appropriate greenspace and frontage.

Samantha Hulme  
1404 Brooke Street



ReplyForward

To: City of Victoria Mayor and Council

August 3, 2022

**Re: Proposed Missing Middle Zoning Bylaw Changes**

**No Effective Consultation**

The proposed Missing Middle bylaw changes have been developed without valid consultation with a majority of residents in the City of Victoria. The “consultation” timeline referred to in the July 12 video session indicated that the surveys had 1,000 residents respond, 200 in 2020 and 800 in 2021. This represents approximately 1% of City residents at best.

A total of 1000 survey respondents out of 92,000 Victoria residents does not provide council with a large enough response to pass these significant bylaw changes.

This push to re-write the bylaws and neighborhood zoning prior to the October civic election establishes doubt as to the quality of thought that has gone into this initiative and councils perceived level of support by residents of Victoria.

Consultation, “during a global pandemic” to quote Mayor Helps, is not effective consultation.

**Official Community Plan & Neighborhood Plans Invalidated**

Over the past two terms of this City Council, we have been subjected to the sustained erosion of our City and Neighborhoods by over development.

The Missing Middle bylaw changes invalidate the OCP zoning and neighborhood plans all at once. I am certain that this is preferred by developers and council rather than the annoying public consultations, site by site variances pursued by developers (VRBA and team), and supported by council and the Board of Variance.

**No Mandate for this Zoning Change**

This council has no mandate to inflict this change on the City of Victoria; particularly councilors who are not residents of Victoria. They will not be subjected to a 10.5M structure built next to their home without having any say in the matter.

**Has any consideration has been given to the impact of these zoning changes on our infrastructure, water, sewer, power, roads, solid waste disposal, roads etc.? What is the target population that our existing infrastructure can handle?**

### **Long Term Oversight Doubtful**

**In the July 12 video presentation, it was stated that the CRD would be responsible for the oversight of the “affordable units” as a result of the bylaw changes. Specifically, “below market value in perpetuity, income testing, units 10% below appraised market value”. I have no confidence the CRD will manage this successfully.**

### **Do Not Approve These Bylaw Changes**

**This Mayor and Council has continued to pursue an agenda of issues that are clearly outside of their roles and responsibilities in the administration of the City.**

**This city has and will change over time but it should be evident that Victoria, surrounded by water, has never and will never have enough land to house all of those who desire to live here. The proposed bylaw changes will add to the erosion of what was once a very attractive City. We have seen the impact of over-development evidenced by the general disrepair and disfunction of the downtown core and the un-ending construction and development throughout Victoria.**

**The real need is for reform of the Local Government Act to reduce council terms, mandate residency in the city mayor and council officials represent, push for GVRD amalgamation, and clearly define the specific roles and responsibilities of city council. For example, efficient approval of housing within the OCP zoning rules and neighborhood plans, preserving the character of Victoria and restoring our dilapidated streets and infrastructure.**

**Enjoy your September trip to the UBCM conference in Whistler.**

**October can't come soon enough.**

**Regards,**

**R Steven Jones**

**1541 Rockland Ave**

**Victoria BC**



SHARON KEEN

ANTHROPOLOGY  
CULTURAL ECOLOGY

#105-975 FAIRFIELD ROAD  
VICTORIA, B.C.  
V8V 3A3

WEDNESDAY, AUGUST 3, 2022

VICTORIA CITY COUNCIL  
#1-CENTENNIAL SQUARE  
VICTORIA, BC  
V8W-1P6

AUGUST 4, 2022. PUBLIC HEARING ON OCP 2012 CHANGES  
(NO. 12-013) AND ZONING REGULATION BYLAW (NO. 80-159) TO  
CREATE DPA 15F: MISSING MIDDLE ZONING.

- \* - THIS PUBLIC HEARING IS A TRAVESTY THAT WILL DESTROY  
THE AFFORDABLE RENTAL SUITES IN "TRADITIONAL  
RESIDENTIAL AREAS" SO OWNERSHIP OF REPLACEMENT  
HOUSING IS FOSTERED: NOT AFFORDABLE TO RENTERS AT ALL!  
THE "LANDLORD FAMILIES" IN THE TRADITIONAL RESIDENTIAL  
AREAS WILL BE DISPLACED TOO: OWNERS & RENTERS TOGETHER!!
- RENTERS ARE SUPPOSE TO THEN BE HOUSED IN TOWERS  
ALONG TRANSPORTATION CORRIDORS - OOPS, THAT'S IN  
VANCOUVER & NOT VICTORIA? DEVELOPERS FROM  
AWAY, WITH COUNCILS ASSISTANCE, NOW ARE BUILDING  
21 STORIED CONCRETE CAGES THAT ARE NOT AFFORDABLE  
TO RENTERS: TRANSPORT CORRIDORS WITH TOWERS NEXT?
- \* - UP-ZONING & DESTRUCTION OF HERITAGE RESIDENTIAL  
HOUSES HAS BEEN RAMPED UP SINCE 2018; SPOT  
ZONING AND VARIANCES IN ALMOST EVERY CASE:  
THE VICTORIA NEIGHBOURHOODS. NOW, THIS WILL ALL  
BE "MADE LEGAL" RETROACTIVELY, & ACCELERATED.
- \*\*\* - THE MINISTERS OF MUNICIPAL AFFAIRS HAVE  
BEEN ABSENT, ESPECIALLY DURING TWO YEARS  
OF "ECONOMIC SUICIDE" BY LOCKDOWNS: DO NOT  
PROCEED WITH THESE CHANGES TO VICTORIA'S OCP  
2012 WITHOUT MINISTERIAL INPUT. AND, MORE  
INPUT FROM COMMUNITY ASSOCIATIONS.

Sharon Keen  
(1/2)

ATTACHMENTS: AUG 3, 2022

- 1 - NOTICE OF PUBLIC HEARING FOR AUGUST 4, 2022  
TIMES COLONIST, 23 JULY 2022, (A8)
- 2 - ANDREW DUFFY, 6 MAY, 2022 "HOUSING DEBATE DELAYED..."  
TIMES COLONIST (A4)
- 3 - ANDREW DUFFY, 27 MAY, 2022 "PUBLIC HEARING..."
- 4 - CHRIS PETTER 6 MAY 2022 "'MISSING MIDDLE' PLAN  
WON'T BRING AFFORDABLE HOUSES"  
TIMES COLONIST (A14)
- 5 - MISSING MIDDLE HOUSING, "PRE-PUBLIC HEARING  
JULY 12TH" TIMES COLONIST, 9 JULY, 2022 (A6)

SWK

# It's your neighbourhood



## NOTICE OF PUBLIC HEARING

Public Hearing items will be considered by Council at a Council Meeting on Thursday, August 4, 2022 at 6:30 p.m. ←



### Where:

Council Chambers  
Victoria City Hall  
1 Centennial Square  
Victoria, BC

### Get Involved:

Outlined below are the ways in which you can participate. The meeting may be viewed and heard via the City's live stream webcast at [www.victoria.ca](http://www.victoria.ca)

## What is being proposed?

*[NO, TO ALL OF THIS. SERK]*

### The City of Victoria is seeking your input on the proposed changes to the Official Community Plan, 2012 (No. 12-013) and the Zoning Regulation Bylaw (No. 80-159):

#### Official Community Plan Bylaw, 2012, Amendment Bylaw (No. 42) - 22-044

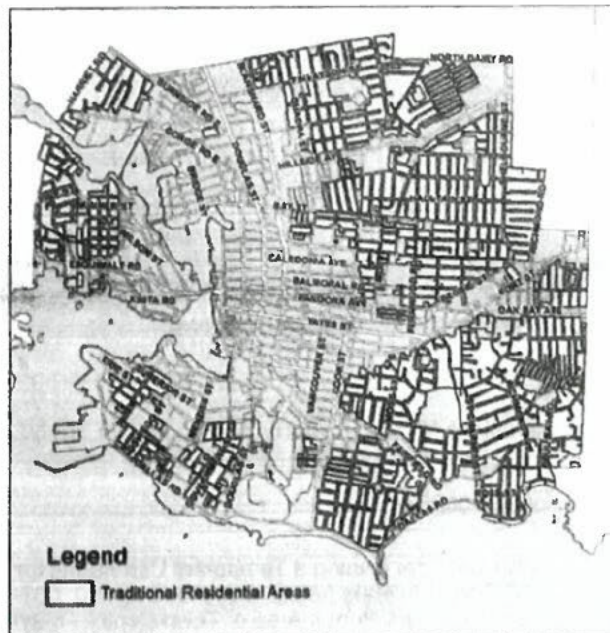
The purpose of this bylaw is to amend the Official Community Plan, 2012 (OCP) to insert language in the OCP to make possible implementation of the Missing Middle Housing Initiative, including the creation of a new Development Permit Area to regulate Missing Middle developments (DPA 15F: Missing Middle Housing).

The following changes are proposed to the OCP:

1. Introduce a definition of Missing Middle Housing.
2. Update the policies relating to Traditional Residential areas in Figure 8: Urban Place Guidelines to explicitly reference "Missing Middle Housing," to support three-storeys throughout Traditional Residential areas, and to support up to 1.1:1 Floor Space Ratio.
3. Create new Development Permit Area DPA 15F: Missing Middle Housing, which applies to development permits for Missing Middle Development.

#### Zoning Regulation Bylaw, Amendment Bylaw (No. 1278) No. 22-045

The purpose of this bylaw is to amend the Zoning Regulation Bylaw to permit houseplexes, corner townhouses, and heritage conserving infill ("Missing Middle Housing") on properties within the Traditional Residential Urban Place Designation of the Official Community Plan, and within one of the following four zones: R1-B, R1-A, R1-G, and R-2. The properties shown in yellow with black outline on the on the below map are within the Traditional Residential urban place designation and may be affected by these amendments. Please contact the City at [communityplanning@victoria.ca](mailto:communityplanning@victoria.ca) to find out if your property will be affected.



The following changes are proposed to the Zoning Regulation Bylaw:

TIMES COLUMNIST (A8) 23 JULY 2022

+



1. New section 49 in the Zoning Regulation Bylaw, to allow for Missing Middle Housing on qualifying lots
2. New Schedule P – Missing Middle Regulations, to regulate the development of Missing Middle Housing
3. New Schedule Q – Highway Dedication Amenity Requirements, to regulate the provision of highway dedications, an amenity that may be provided in exchange for bonus density in Missing Middle Housing
4. New Schedule R – Legal Agreements, to provide a standard legal agreement that may be provided in exchange for reduced parking requirements on Missing Middle Housing

For further inquiries on how a particular property will be affected, contact Community Planning at [communityplanning@victoria.ca](mailto:communityplanning@victoria.ca).

### How to Participate:

All persons who believe their interest in property is affected by the proposed bylaw will be given a reasonable opportunity to be heard. You may indicate your support or opposition to a Public Hearing item in one of the following ways:

#### 1. Watch the meeting live at the following link:

- <https://www.victoria.ca/EN/main/city/mayor-council-committees/council-committee-meetings.html>

#### 2. Submit written comments:

- Email: [publichearings@victoria.ca](mailto:publichearings@victoria.ca)
- Mail: Legislative Services, #1 Centennial Square, Victoria, BC V8W 1P6
- Drop off: to the Ambassador in City Hall Lobby (entrance off Pandora Avenue)
- Written submissions must be received by 2:00 p.m. the date of the meeting

#### 3. Submit a pre-recorded video:

- Email submission to [publichearings@victoria.ca](mailto:publichearings@victoria.ca)
  - Maximum 5 minutes in length
  - Must be received by 2:00 p.m. the Tuesday before the meeting

#### 4. Pre-register to speak live – via telephone

- Email [publichearings@victoria.ca](mailto:publichearings@victoria.ca)
  - Maximum 5 minutes to address Council
  - Register by 2:00 p.m. the day before the meeting
  - Alternatively, you may watch the meeting live stream and call to speak during the public hearing by calling 778-698-2440: participation code 1551794#.

#### 5. Attend in-person

- Council Chambers, Victoria City Hall, 1 Centennial Square, Victoria, BC

Please note that the opinions you express orally and any presentations you submit will be webcast live and will be recorded to form a part of the public record. Correspondence you submit will form part of the public record and will be published on the agenda when this matter is before Council. The City considers your address relevant to this matter and will disclose this personal information, as it informs Council's consideration of your opinion in relation to the subject property and is authorized under section 26(c) of FOIPPA Act. Your phone number and email will not be disclosed. For more information on the FOIPPA Act please email [foi@victoria.ca](mailto:foi@victoria.ca).

### **How to view relevant documents, the proposed bylaws, and information about the Missing Middle Housing Initiative:**

Council Agenda: available the Friday before the meeting date at:

<https://www.victoria.ca/EN/main/city/mayor-council-committees/council-committee-meetings.html>

In person: Inspect documents at City Hall by making an appointment by phoning 250.361.0571 or by emailing [legislativeservices@victoria.ca](mailto:legislativeservices@victoria.ca).

Additional information on the Missing Middle Housing Initiative which informs this update can be found at <https://engage.victoria.ca/missing-middle-housing> or by making an appointment at City Hall as identified above.

# Housing debate delayed so public can review 2,000 pages of detail

ANDREW A. DUFFY  
Times Colonist

The City of Victoria will give the public another week to digest the ream of material available on its missing-middle housing initiatives as the committee of the whole voted Thursday to postpone fulsome discussion of the topic.

The committee had been expected to debate delegating to staff the authority to approve permits for some development projects and changing bylaws and land-use regulations to allow new forms of housing. But Coun. Sharmarke Dubow called for it to be set aside.

Dubow's motion was initially accepted, but Coun. Jeremy Loveday, who voted against postponing, asked to have the postponement reconsidered.

After a brief recess, plenty of confusion around the committee room and discussion with legal advisers, the committee decided to take in the staff report on missing-middle housing, this week and delay until next Thursday the fulsome discussion of amendments and motions.

"There's a willingness to hear from staff today, but we would like another week to hear from



Coun. Ben Isitt said giving the public another week is reasonable.

ADRIAN LAW, TIMES COLONIST

the public before we embark on any substantive debate on any recommendations in relation to this item," said Coun. Ben Isitt. "I think giving our public another week to digest the materials and communicate their views to us is reasonable."

Dubow said it not only gives the public time to review the 2,000 pages of information available, but it would allow council to "really think about and make an informed decision."

The idea behind the missing-middle housing project is to increase the number of housing options in Victoria to allow families to stay in the city, reduce



Coun. Sharmarke Dubow said a delay would give the public time to review 2,000 pages of information. QUINTON GORDON

dependency on cars while ensuring new housing developments suit the character of neighbourhoods and preserve heritage.

A city staff report suggests that could be done by amending bylaws, land-use procedures and official community plans to permit infill, houseplexes and corner townhouses in some neighbourhoods.

They also recommend allowing staff to approve permits for projects that comply with all design guidelines and zoning, cutting down the time it takes to build and reducing costs that could translate into less expensive housing options.

The city has already accelerated the process for qualifying affordable housing projects, which is expected to trim as much as nine months, and an estimated \$2 million, off a typical project.

In the report tabled Thursday, city staff said an extensive engagement process showed strong support for a streamlined process to approve houseplexes, townhouses and heritage converting infill. Only eight per cent of respondents indicated that none of the housing forms should follow a delegated development permit process.

The report also suggests missing-middle housing design guidelines and the streamlined approval process would apply in all traditional residential areas in Victoria. The guidelines would require a certain amount of parking. Where that couldn't be achieved due to the size or layout of the lot, developers would be expected to provide transportation substitutions such as car-share co-op memberships and transit passes.

Information for the public is available at [Victoria.ca](http://Victoria.ca) under "council and committee meetings."

[aduffy@timescolonist.com](mailto:aduffy@timescolonist.com)

A TRAVESTY  
TAX BOTH  
CINCY  
AFFORDABLE

3 WIXE D  
BURNER /  
RENTER  
IN  
"TRADITIONAL"  
RESIDENTIAL"  
HOUSING

Renters pay  
property taxes  
via landlords  
too!

# Public hearing on new types of housing for Victoria delayed

27 MAY 2022

ANDREW A. DUFFY  
Times Colonist

A public hearing into what the city calls its "missing middle" housing program will be put off until late summer, which means it might not be considered before the next election, after council voted Thursday to refer the matter back to its staff for more public input.

The goal of the program is to amend bylaws, land-use procedures and official community plans to permit infill, house-plexes and corner townhouses in some neighbourhoods.

On Thursday, most of council sided with Coun. Ben Isitt, who suggested the matter be referred back to staff to convene a public engagement workshop and report back with the results.

Isitt, who has pushed to delay the process over recent weeks, has said he would like to see requirements for affordable units included in the more dense housing options the strategy proposes.

The goal of the missing-middle housing program is to increase the number of housing options in Victoria so families can stay in the city, while reducing dependency on cars and ensuring new housing developments suit the character of neighbourhoods and preserve heritage.

Where zoning currently only allows for single-family homes, it would allow duplexes, triplexes and four-plexes as well as townhouse projects on assembled land.

Isitt said Thursday the changes are complex and apply to more than three-quarters of the city's land base. "So I think it's reasonable for us to ensure the public has had an opportunity, an adequate opportunity, to consider what's proposed, that there's been a proper analysis, both by the public and by council, of the potential advantages and disadvantages of the proposed regulatory approach," he said.

The delay will allow extra time to determine how the program could be refined to optimize affordability and reduce the risk of land speculation, Isitt said.

Siding with Isitt were councillors Geoff Young, Sharmarke Dubow, Stephen Andrew and Charlayne Thornton-Joe.

"I do think it needs more time," said Thornton-Joe. "I also feel that we need to bring people

along with us and support this and celebrate this as a positive initiative. "I don't think I want to give people more stress than they already are enduring."

But Mayor Lisa Helps, who voted against Isitt's motion, along with councillors Marianne Alto, Jeremy Loveday and Sarah Potts, said the only thing accomplished Thursday was to delay until the next council a strategy that could actually be part of the housing solution.

Helps said there has already been two years of consultation with the public and affected stakeholders and countless hours of city staff looking at the strategy from every angle.

"There's nothing one more workshop will do," she said in an interview. "Our staff have done a comprehensive study to bring this forward. So more engagement is not going to bring us anything new. It's just going to take more time. And while we're sitting there engaging, the costs of townhouses are going to continue to rise." While the impact of the missing middle program isn't known, Helps said, the result of doing nothing is "massively escalating costs of housing in our city and in our region."

Helps said the program is not a silver bullet, but part of a suite of initiatives to tackle the housing crisis. "This is not the affordable housing initiative, it's the attainable home ownership initiative," she said. "The expedited affordable housing and the villages and corridors planning [strategy] is the affordable and the rental housing initiative."

Helps said increasing housing costs make it ever more difficult to attract city staff, doctors, teachers, mechanics and professionals to Victoria.

"We could be part of the solution," she said. "We could help with these problems by getting out of the way so more housing can be built. We need to make it easier to build homes that families who live in our city can afford — it is that simple."

Helps said it's unrealistic to expect staff to report back with the results of another engagement workshop, which is yet to be scheduled, before the fall. "I very much doubt we'll get to a public hearing on this before the election, which I think is a real disservice to the public," she said.

aduffy@timescolonist.com  
(Painstakingly did CCP!)

NOT DELAYED ENOUGH! AUG 4

NOT LOCKDOWN!

(LOCKDOWN?)

OWNERSHIP NOT AFFORDABLE ENTIRE RENTERS DISPLACED TO THE STREET CORRIDORS

# 'Missing middle' plan won't bring affordable houses

CHRIS PETTER

A commentary supported by 30 residents of Victoria.

How does Victoria Mayor Lisa Helps's Missing Middle Housing initiative ensure that it will provide affordable housing to those who really need it?

Without the rationale of affordability, this upzoning initiative is not justifiable. It would soon spur demolitions/demovictions that will displace renters from affordable suites, to be replaced by multiplexes with small apartments or expensive condos (six units on any lot).

Land assembly will allow many unaffordable townhouses at the end of every block and perhaps mid-block (up to 12 units). Suggested increases in height are three metres, and in site coverage is 40 per cent while open space requirement is only 30 per cent.

There is a suggested decrease in parking requirements to .15

spaces per dwelling. Surrounding neighbours will be up in arms about shadowing, loss of canopy and the inability of service people to park close by.

Although the mayor claims it will not happen overnight, the Missing Middle engagement report notes that a substantial increase in the volume of development permits is expected.

The plan should primarily be for Victoria-based young families who can't afford our average \$1.42-million housing prices. Even the below-market housing ownership price suggested in the report to council is set at only 10 per cent lower than the average market price.

Victoria's 2012 Official Community Plan was years in the making and was informed by more than 6,000 residents. The online engagement leading to the missing middle report had only 800 participants.

By and large, people living in Victoria's residential districts are unaware of the implications of this proposal: The diminution

to their quality of life and the unpredictable disruptions that will become commonplace in their neighbourhoods.

Changing the OCP so radically should be informed by wide consultation throughout the communities.

In fact, the missing middle report should be an election issue in October so that all voters can provide informed consent. Otherwise, the suggested changes are undemocratic and should be tabled pending broader consultation.

The prospect of all B.C. residential areas being upzoned by the province after the municipal elections would make more sense. Were the whole province to be upzoned, rather than just Victoria, land inflation could be much better controlled.

And it would also be better if new housing was built around transportation hubs and corridors as proposed by the province, rather than in three so-called "low density" neighbourhoods as proposed in

Victoria, where developers can make huge profits of more than 100 per cent on multiplexes and townhouses.

A lot of the pressure on Victoria residential properties is coming from investors. The *Globe and Mail* recently calculated that 22 per cent of buyers in Victoria were investors.

A missing middle strategy should include a means for public housing providers to compete for land with private developers. Unless for-profit, market, single-house replacement is taxed when developers take advantage of the increased density that would be permitted, there will be no opportunity for homeowners and non-profits to create affordable housing.

If the idea is attempted at this uncertain time, it should be restricted to a two-year pilot project. As the Canadian Centre for Policy Alternatives recently advised the City of Vancouver:

"While upzoning is a key piece of the housing puzzle, it is not a panacea. Upzoning must

be accompanied by complementary policies — such as a big build-out of non-market housing, supportive financing and rent controls — and linked to planning for public transit and other public services and amenities. Upzoning should thus be viewed as part of a plan to manage housing in the interests of people who live and work in the city and should be accompanied by measures to dampen land speculation and purchases of investment properties."

The quickest and best way to produce affordable housing for renters in residential areas would be if the City of Victoria and B.C. Housing offered grants to homeowners to build family housing or rental suites in return for guarantees of affordability for 10 years or so. The proposed zoning and policy changes will not create the ground-level affordable housing that is needed — it will only make matters worse, especially for the families of people who work in the city.

# Missing Middle Housing



## Join us at a Pre-Public Hearing Information Session

The **Missing Middle Housing Initiative** proposes to allow houseplexes and corner townhouses in addition to single-family homes in Traditional Residential areas of the city to create more homes and housing choice without the need for a rezoning.

INFO SESSIONS

**Tuesday, July 12**

**Virtual noon - 1 p.m.** (REGISTRATION REQUIRED)

**In-Person 3 - 7:30 p.m.** (DROP-IN HOURS)

**Victoria City Hall, Antechamber**

#1 Centennial Square - Pandora Avenue entrance

Ask Questions

Get Informed



Register for the online session and learn more at [engage.victoria.ca/missing-middle-housing](https://engage.victoria.ca/missing-middle-housing)

[engage@victoria.ca](mailto:engage@victoria.ca) | 250.361.0210

"PLUNDER OF THE COMMONS" EXPEDITED WITH AUGUST 4

"PUBLIC HEARING" AFTER JULY 12

"PRE-PUBLIC HEARING"



NO MINISTERIAL INPUT

TIMES CELEBRIST (MAY 15 2022)

[REDACTED]

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**From:** Sandra Smith [REDACTED]  
**Sent:** August 3, 2022 4:47 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Initiative

How really sad and misinformed this bylaw proposal is, flying in the face of years of carefully developed Neighbourhood plans and considered community input.

Does this comment arise from NIMBYism? No, I simply want you to recognize that my Neighbourhood provides solid and affordable housing for seniors, renters, students and persons requiring care. Wholesale rezoning with such significant densities and massing will place my neighbours at risk of displacement, destroy the ambience of a beautiful area, and the quality of life in Fairfield.

Please reject this bylaw.

Sandra Smith  
1436 Fairfield Road  
Victoria, BC  
V8S 1E5

[REDACTED]

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**From:** Teresa Haggart [REDACTED]  
**Sent:** August 3, 2022 9:43 PM  
**To:** Public Hearings  
**Subject:** Re-zoning proposal - "Missing middle"

Hello,

Due to health reasons I will be unable to attend the Aug. 4th meeting on the issue of re-zoning all residential neighbourhoods.

I am ***opposed*** to this as I feel it would give too much freedom for large units that do not fit into all neighbourhoods without ruining them. Take it one step at a time.

If we look to the municipality to the east, Oak Bay is only now considering suites! And they have a very strict set of guidelines that need to be met including how many people will be allowed to reside on each property. Let them step up a lot more on the need for more housing before putting Victoria residents and home owners through such a huge shift!

Thank you,

Teri Haggart, concerned citizen

Born, raised and have resided in Victoria municipality since 1978

[REDACTED]

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**From:** Thomas Lacey [REDACTED]  
**Sent:** August 3, 2022 10:18 PM  
**To:** Public Hearings  
**Subject:** MMHI Submission for August 4

While I support initiatives to address housing, I am not comfortable with the policy going forward as is as I do not believe it can meet the objectives that have been set out. I therefore am voicing my objection.

This initiative is too far reaching to get it wrong. And yet, there are too many assumptions that are made. This needs further examination and greater discussion with the residents of Victoria before it goes to the approval stage.

Thomas Lacey  
1823 Fairfield Road  
Victoria, BC V8S 1G9



[REDACTED]

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**From:** Will [REDACTED]  
**Sent:** Wednesday, August 3, 2022 3:31 PM  
**To:** Public Hearings  
**Subject:** I support Missing Middle Housing

Hi, I'm a homeowner in Gonzales, my wife is a small business owner, and we both wholeheartedly support the Missing Middle plan. Density isn't bad for a residential neighbourhood, it's great!

We lived in Europe for a year (2015) and got to see firsthand how excellent this kind of gentle density can be for the culture of a medium-sized city like ours.

After that year, we returned to Vancouver. What a contrast! We spent more than six months searching for housing until we gave up and moved to Victoria. That was ultimately a great decision for us, but it highlights the trajectory we're currently on, and the need for change. We want a city full of gentle density so nurses, doctors, service workers, government employees, and our friends can continue to make a life here.

Thanks for reading,  
Will

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:45 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Initiative - Stop It Now and Leave It For the Next Council

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**From:** Alison Heldman [REDACTED]  
**Sent:** August 3, 2022 7:34 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Cc:** 'Alison Heldman' [REDACTED]  
**Subject:** FW: Missing Middle Initiative - Stop It Now and Leave It For the Next Council

August 3, 2022

Dear Mayor and Council,

I am very distressed with Missing Middle Initiative.

First, from what I have read the initiative is mis-conceived. The elimination of single-family zoning cannot create affordable housing but is just an invitation to developers to destroy the City's residential neighbourhoods.

Second, the process has been marked by deception and misinformation. The proposal shifts without proper notice and is being pushed ahead without the opportunity for proper consultation. Such a massive change to the City's structure needs much more notice to residents to let them know what the real ramifications are and to give them a real opportunity to consider and respond. Administrative fairness requires proper disclosure to those whose interests are affected. Given the magnitude of the proposal, this means each residential property owner should be getting written notice of the intent to rezone their property, and their neighbour's property to allow multiplex housing.

The proposed rezoning is not being requested by the property owners who are going to be affected but is being imposed on them. This is an extraordinary step that should only be taken, if taken at all, after extensive and meaningful consultation to obtain the consent of those whose are directly affected.

The process currently being pursued is a travesty. It is the first summer in two years that people have been able to travel and visit families. As well school is out, and parents have more demands on their time: being with their children and keeping them occupied during the vacation. Pretending that people can effectively engage in a consultation process this summer shows a total lack of regard or concern about public input. Continuing this process during the summer illustrates the problems identified in the recent Governance Report: you are pursuing your person agendas without regard to the public interest.

Third, in the past the City had a Community Plan that meant something; not the least of which was being the ability to live in the City knowing what sort of community you were going to live

in. Once again, this Council is demonstrating a complete disregard for the Community Plan, and for all the work and effort over the years that created the Community Plan.

Mayor and Council: pushing this Initiative through is a disgrace to the democratic process. You were elected to act on behalf of all citizens in the City, not to implement your own private agendas.

This Initiative should be stopped now, and the issue left to the next Council to consider.

Regards,

Alison Heldman  
1005 Pentrelew Place  
Victoria, BC V8V 4J5

[REDACTED]

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**From:** Alana James [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:58 AM  
**To:** Public Hearings  
**Subject:** Strongly support passing the bylaws for missing middle housing initiatives

Hello,

I have lived in Victoria for over 20 years. I am lucky enough to own a small house here.

I very strongly support council passing the four bylaws for the missing middle housing initiatives.

I am an executive with the government and am seeing first hand the growing problem of people not being able to afford living, and thus working, in Victoria. We have countless jobs unfilled because of the housing being unaffordable.

This is just one reason why I support these initiatives.

Kind regards,  
Alana

[REDACTED]

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**From:** Andrea Lee [REDACTED]  
**Sent:** Thursday, August 4, 2022 11:24 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative - Written Submission for Council Meeting Tonight

Hello,

My name is Andrea Lee, I live in a two-bedroom condo unit at 2608 Prior Street (V8T3X8), and I strongly **support** implementing the Missing Middle Housing Initiative. My husband and I moved to Victoria and have lived here for 15 years. We love just about everything about the city - the people, the politics, the parks and infrastructure - we work for the government and enjoy our jobs. But we've seriously considered leaving the Greater Victoria region recently because it's simply so expensive to rent or buy housing here. We have one child and would really like another, but while it's so difficult and expensive to find anything with three bedrooms, it's not in the cards for us if we stay in this city. It would break our hearts to leave, but that might be the best option we have as things are.

I can understand that people who already have housing that is more than sufficient for their needs have concerns about the character of their neighbourhoods changing completely, but I think that the Missing Middle housing plan that's been developed is a fair approach that balances their concerns with the needs of many of us who find that current housing options don't match our needs or future needs.

The neighbourhood I live in (Quadra Village) has a similar mix to what's described in the plan: a few low apartment or condo buildings, some houseplexes, and a majority of single-family houses. It is a friendly, diverse neighbourhood that is not negatively impacted by the mix of housing types in it. And it clearly works for a wide range of people, as I see parents pushing strollers, people using mobility aids, seniors, and young people on the sidewalks every day. It is the warmest, most vibrant neighbourhood of everywhere I've lived in Victoria, so I believe that if the Missing Middle plan is implemented, it will not be a detriment to any neighbourhoods that are changed by it.

Finally, I think this needs to happen because things just can't continue as they are. My husband and I have good jobs, and a combined income that would buy a nice house anywhere in BC outside of Victoria or Vancouver. If we're looking at the Victoria housing market and thinking "Gee, it might be too expensive to live here" then I can only imagine what it must be like for people who aren't as lucky. Please go forward with the Missing Middle Housing Initiative and let's get started fixing this problem.

Please.

Thank you for your time,  
Andrea

[Redacted]

**From:** Alex McCumber [Redacted]  
**Sent:** Thursday, August 4, 2022 11:06 AM  
**To:** Public Hearings  
**Subject:** Public Comment on Missing Middle

Attn. Mayor Helps and Council,

While I support the intent of the missing middle policy initiative, I challenge council and staff that the by-laws, guidelines and contribution requirements to realize full density of projects are not economically viable for development and result in an ineffective policy. As a result, I do not foresee much if any new housing stock to result from these changes in the short term.

To provide much-needed housing stock it is imperative that any new urban development be built to the maximum FSR available. To leave any pre-zoned density on the table for new projects is irresponsible use of urban land.

The missing middle policy can be doing more to allow this density to be realized and entice small-scale developers to build purpose-built rentals and missing middle type homes. Some ideas that would make mid-sized development more viable would include; 1) remove minimum parking requirements, 2) expand Rental Tenure Zoning (or covenants), in which the city designates properties slated for development as rental-only housing, and then allow greater height and density for these projects.

In summary I support the missing middle changes and request as stated in the June 28 Council Report, to monitor the impact of any missing middle zoning changes against the achievement of objectives summarized in the Missing Middle Housing Policy and look to revise and update the by-laws and guidelines to encourage the development of the missing middle typologies and allow projects to be built to the maximum density available.

Thank you for your consideration,

Alex McCumber, Architect AIBC, LEED AP

[Redacted]

dHKarchitects

**Victoria**  
977 Fort Street V8V 3K3

[Redacted]

**Nanaimo**  
102-5190 Dublin Way

[Redacted]

[REDACTED]

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**From:** Allison Nelson-Bruce [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:11 PM  
**To:** Public Hearings; Victoria Mayor and Council  
**Cc:** [REDACTED]  
**Subject:** Missing Middle Public Hearing - Opposed

Dear Mayor & Council,

We are concerned with the proposed regulatory changes to address the Missing Middle in Victoria. Upzoning of residential lots throughout the city, without individual neighbourhood consultation, would negatively impact communities. Practical matters such as parking need due consideration when increasing the amount of density. The loss in greenspace and increase in building height will also impact the look and feel of communities. More thought needs to be given to development projects shaping our communities and constituents should not be left to live with the unchecked plans of developers. It is our feeling that a balance needs to be maintained amongst the key stakeholders - including public consultation - to ensure that the interest of all parties is reflected in the urban planning of our city.

This needs to be an election issue. We recognize the need for affordable housing, but there needs to be more thoughtful consideration when evaluating how these new initiatives will impact our communities. As a taxpayer in Gonzales, we do not wish to see the beauty of our neighbourhood eroded through the elimination of rezoning applications simply to expedite your process. The quality of our environment directly impacts the well-being of the people in the community and it is important that the city continues to meet the interests of all parties involved.

Sincerely,

Jeremy Bruce & Allison Nelson  
2006 Romney Road

[REDACTED]

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**From:** [REDACTED]  
**Sent:** August 4, 2022 8:52 AM  
**To:** Stephen Andrew (Councillor); Victoria Mayor and Council; Ben Isitt (Councillor); Marianne Alto (Councillor); Public Hearings  
**Subject:** Fwd: Missing Middle Public Hearing August 4th

Good morning,

I would like to state that we completely concur with the letter below. Unfortunately we are on holiday out of town so have no way of attending this very poorly timed meeting. We're completely disgusted that council feels that August is the right time to hold such a meeting and therefore believe they simply think it's the best time for council to push it through with the least opposition.

Alessandra Ringstad & Gerry Morrison  
420 Kipling st  
[REDACTED]

Begin forwarded message:

**From:** Samantha Hulme [REDACTED]  
**Date:** August 3, 2022 at 12:31:32 PDT  
**To:** "Stephen Andrew (Councillor)" <stephen.andrew@victoria.ca>, Victoria Mayor and Council <mayorandcouncil@victoria.ca>, "Ben Isitt (Councillor)" <BIsitt@victoria.ca>, MAlto@victoria.ca, publichearings@victoria.ca  
**Subject:** **Missing Middle Public Hearing August 4th**

First off, we support attempts at increasing both affordable housing for low income people as well as the "missing middle" population. We have written to Council and the city managers about the proposed development at Kipling street multiple times over the last number of years (see most recent email below). We are not opposed to multiple units on traditional single family home lots - but development must be pursued with respect to existing neighbourhoods and taxpayers perspectives. We in fact live in 1 of 3 homes that were built 23 years ago on a long lot with one 100 year old rancher style home. The development of our homes included and respected community input and were built in character with the neighbourhood.

That said, holding an important public hearing in the middle of summer and during the BC holiday short week when many, many people will not be in town is grossly unfair and would seem like an attempt to tick the public consultation box without really wanting the tax paying public's input.

The issue of the missing middle and future developments is an Election Issue and should be discussed during the campaign and a public consultation held after the election.

With the greatest of respect, this council does not have a mandate at this time to make any decisions about this issue, according to your own commissioned study as to your approval rating - you have lost the trust and confidence of most of the Victoria population who do not feel you are representing the will of residents.

We were very disappointed that this Council deferred a decision on our community Brooke Park dog hours pilot project request until after the election. Again, with respect, if Council felt ill equipped to decide something as simple and



uncontroversial as a pilot project for off leash hours at a neighbourhood park where such had been the practice for decades, how is it possible that they feel they can adjudicate over the largest land use decision in a decade - 2 months before an election, with a 25% approval rating.

Please defer any decisions on new affordable housing and the missing middle proposals until after Victoria residents have chosen a new Council and new consultations can begin when residents are back in town from summer holidays and related activities.

Thank you,

Samantha Hulme  
1404 Brooke St

## Townhouse development at 349/351 Kipling/1400 Fairfield

Inbox



Samantha Hulme

to planandzone



Joanna Fox, Chair David Molinski, Vice-Chair Land Use Committee

I am writing again to oppose the development proposal for 1400 FAIRFIELD RD, 349 KIPLING ST, and 351 KIPLING ST significantly impacted by its development.

We have participated in previous community consultations about these properties, when originally proposed townhouse complex.

While it appears now that the new proposal is an altered design more in keeping with the neighbourhood character and neighbourhood. Again, the design is much too tall and not in keeping with the neighbourhood character.

We still hold concerns related to increased traffic (already now an increased problem on Kipling/Fairfield/Durham playground, dwarfing the neighbouring properties and eliminating their sunlight for much of the day/evening.

6 townhomes at a consistent height with the neighbourhood, including appropriate greenspace and frontage

Samantha Hulme  
1404 Brooke Street



ReplyForward

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:46 AM  
**To:** Public Hearings  
**Subject:** FW: MMHI

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**From:** Alison Smith [REDACTED]  
**Sent:** August 3, 2022 6:33 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** MMHI

Hi Mayor and Councillors,

I'll keep this short as this is a simple, but necessary stipulation in housing moving forward:

Please ensure there are **first rights of refusal for existing tenants for every new unit built, AND that if the tenant stays, rent will only increase as per the RTB percentage as part of their regular rental agreement.**

To omit this will put even more people on the street.

Please work with the Province as needed to ensure this.

Thanks,

Alison Smith  
21-year Fairfield renter and human ecosystem (aka community centre pool) advocate

P.S. Looking forward to siting the new pool ;)

[REDACTED]

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**From:** agatha s [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:37 AM  
**To:** Public Hearings  
**Subject:** Missing middle comment

Dear City Councilors and Staff,

I live on the 1000 block of Johnson street. I have been watching this city change, through the new bike lanes, removal of parking lots to make room for new buildings and all of the new towers going up. The one thing that I have seen missed again and again that would help the missing middle, are 3 and 4 bedroom condos/apartments. Of the 9 or 10 new buildings that have been built in the last 5 years within 2 blocks of me, the only 3+ bedroom units have been the penthouse suites. You can't expect people to live where they work and not give them the opportunity to grow their family (however that looks). Realtor.ca is flooded with studio and one bedroom condos in this area because they are not functional for family living. The current missing middle plan will not do enough to retain families in these neighborhoods. The increased densification will not create more larger housing options. I do agree with the plans, but I would like to see considerations for larger condo units included in the city's plans.

In closing, I want you to imagine living in a condo building downtown. All of the units are 3 or 4 bedroom units. You have a family with one or two children. They say, I'm going to Susies to play, and they head out the door, take the elevator up or down a few floors and are safely with their friends. Or playing at the communal playground (like the one in the new Hudson buildings on Blanchard that is inaccessible to the public). We would be able to continue walking to daycare and work because we would be in the same area rather than racing to the car to drive to a family oriented part of the peninsula that has room for us to grow.

Thank you for your time and consideration.

-Agatha Soful

[REDACTED]

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**From:** Adam Valair <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:01 PM  
**To:** Public Hearings  
**Subject:** Missing middle

Please vote to approve the missing middle housing policy. This city has got so much to do on housing and needed to get started 20 years ago. Let's get it going.

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 10:23 AM  
**To:** Public Hearings  
**Subject:** FW: Mssing middle

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**From:** Beth Barnes [REDACTED]  
**Sent:** August 4, 2022 10:13 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** re: Mssing middle

Dear Mayor and Council

I do not support you trying to push this through before the election in October. It should be left for the new council.

I do not support homeowners not being able to have a say about what goes into our neighbourhoods!!!! This would take away our rights!

I also think that the parking issues that will result with this type of change will be ridiculous!

Do the responsible thing and leave this for the next council!

Beth Barnes  
629 Harbinger Ave  
Victoria BC V8V 4H9  
[REDACTED]

[REDACTED]

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**From:** Bharat C [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:35 PM  
**To:** Public Hearings  
**Subject:** Comments for Missing Middle Public Hearing August 4 2022: I support

Hello:

My name is Bharat Chandramouli and **I am writing to support the zoning and other changes that are being proposed on the Missing Middle initiative for Victoria.** I have lived in Fernwood one block from downtown Victoria for the past 12 years in a two-bedroom condo with my partner and a five year old. We love living in Victoria as it enables us to have an active car-lite life. Between our cargo bike and easy access to the wonderful protected bike infrastructure, we can get around easily and we're even comfortable having our 5 year old bike in the lanes when supervised by us. Our ability to walk and bike everywhere is key to our enjoyment of Victoria.

We would like more space as we now work from home and our kid's second bedroom is not going to be big enough for her as she grows. But even though I am a well-paid professional, Victoria's family friendly housing is largely inaccessible to me. My family would like to live in a family-friendly, bike and walk friendly neighbourhood with access to some yard space and a bit more room for us to work and live comfortably from home. But, our only alternative is single family housing as that's the norm, and for me, this is not a good fit both from an affordability and fit perspective. I prefer living with a bit more community, in townhomes, row houses, multiplexes etc where we can use that extra efficiency to save energy and be more efficient while still having the family feel that downtown-adjacent condo living does not provide. Also, given the age of our single family stock, I have no desire to spend the time/money to keep a century-old house running.

We need way more housing options for families like me. While this missing middle initiative will not solve the affordability problem by itself, we need separate and related non-market initiatives and bulk-building of affordable rentals, co-op housing and more, and sustained provincial and federal investment. I believe that we need to decisively remove the inefficient single family home as the default option for families and replace it with climate-compatible and denser city-style housing. I want us to be able to change current SFH into multiplexes/townhomes without public hearing and rezoning. There is an massive injustice when a wealthy person can choose to build a massive mansion on their property to house 1-2 people without needing permission, whereas if 6 families want to live there, then we need rezoning and lengthy processes with multiple veto points. This needs to change. While parking is cited as a concern, we need to acknowledge that we live in a city, space is limited and people are prioritized, not cars.

For all these reasons, I am writing in to support the missing middle initiative. Thank you for your time.

Regards

Bharat Chandramouli, Ph. D

[REDACTED]

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**From:** BD [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:38 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Approval

Dear Council,

I would like to voice my enthusiastic support for the urgently needed Missing Middle Plan. I applaud your bravery for putting forward a plan that will actually make progress on our severe housing crisis in the face of the typical loud opposition that has created the problem in the first place.

Please act in the interest of those who currently do not have access to housing in the city and the future generations who will not be able to live in this city without having an intergenerational property. Please approve the plan and do not listen to the few, loud opposing voices but the voices of the many who need your help.

Thank you Brent Dallimore.

[REDACTED]

---

**From:** Bob Gaba [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:21 PM  
**To:** Public Hearings  
**Subject:** Public Hearing (4 August 2022) - Comments on Proposed Housing Initiative

Dear Mayor and Council,

We believe that the housing issues in Victoria need to be dealt with by the IN-COMING MAYOR AND COUNCIL AFTER THE FALL MUNICIPAL ELECTION.

The housing issues in the city are complex, and should be addressed in a manner that is respectful to all residents (including property owners and renters).

Please stop the present nonsense. THE HAIR-BRAINED PLAN TO APPROVE A BLANKET-REZONING ACROSS THE CITY WILL CAUSE SERIOUS PROBLEMS FOR ALL.

Developers, real estate agents, and municipal governments (i.e., the present Mayor and Council) in large part have created the problem of insufficient housing, and residents (especially home owners) should not suffer any consequences of this.

Affordable housing will only be achieved through the participation of the various levels of government, otherwise developers and sales agents will continue to line their pockets and exacerbate the problem.

Housing built by free-enterprise outfits are in the business of making maximum profits (with unregulated maneuvers such as "inside pre-selling" to family members and friends, and selling to "offshore clients" ) and very little to no housing will be "affordable" for locals.

THIS ISSUE IS TOO IMPORTANT FOR AN OUT-GOING MAYOR AND COUNCIL TO DECIDE AS THEY WALK OUT THE DOOR AT THE END OF THEIR TERM.

Decisions related to housing in Victoria should be an ELECTION ISSUE THAT CITY RESIDENTS CAN VOTE ON DURING THE UPCOMING ELECTION.

**Please make the right decision and POSTPONE THE HOUSING INITIATIVE UNTIL WE HAVE A NEW MAYOR AND COUNCIL THAT IS VOTED IN BY RESIDENTS IN THE FALL.**

Thank you.

-----  
Bob Gaba & Charlotte Gann  
Home Owners  
1617 Amphion Street  
Victoria  
[REDACTED]





[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 9:30 AM  
**To:** Public Hearings  
**Subject:** FW: Thumbs up for Missing Middle

-----Original Message-----

From: Britta [REDACTED]  
Sent: August 4, 2022 9:08 AM  
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
Subject: Thumbs up for Missing Middle

Dear Mayor Helps and Members of Council,

Yesterday's Times-Colonist editorial and today's feature in Capital Daily are both correct. The Missing Middle proposal should be passed and the strategy should be implemented.

My major concern is that a minority of developers may try to maximize their returns by a) building "luxury" units that are still very far beyond the reach of people in the "middle"; b) building bare-bones units that skirt the proposed design guidelines including those for safety and accessibility features, generous set-backs, much-needed, heat-reducing green space and plantings, etc.; c) still applying for variances to go even higher.

Protections will need to be strengthened for people living as tenants in properties that may be re-developed. It will not be just to "un-house" one or two families of renters today for the prospect of being able to "house" four families who can afford to buy or rent a more expensive home a year or two later

In order for the Missing Middle to be a successful, long-term approach, it needs to be implemented as proposed. This places an even-greater responsibility on City staff and they will need Council's support.

Finally, future Councils need to exercise their mandate to review this, and other housing initiatives periodically, possibly on a five or ten year cycle.

Thank you for your hard work trying to improve our city.

Britta Gundersen-Bryden  
Victoria

[REDACTED]

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**From:** Bruce Hodding [REDACTED]  
**Sent:** Thursday, August 4, 2022 11:43 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle

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**From:** Bruce Hodding [REDACTED]  
**Sent:** August 4, 2022 11:37 AM  
**To:** Mayorandcouncil <mayorandcouncil@victoria.ca>  
**Subject:** Missing Middle

Dear Mayor and Council,

I am writing to express my opposition to the so-called Missing Middle initiative.

The move is anti-democratic; it strips effective control from the citizens of Victoria and gives it to the financially powerful who will overrun the city and remove any remaining community. In effect, it does everything to oppress and destroy the local community in favour of Vancouver development money. The problem of housing is directly related to the Federal Liberal Government austerity program in 1993; initiating another disastrous policy will not solve the initial problems and will only create more problems.

Please reject this thinly veiled attempt to give power and control to money interests and retain the power and control in the hands of the citizens of Victoria.

Regards,  
Bruce

Bruce Hodding  
PO Box 50011  
RPO Fairfield Plaza  
Victoria, BC V8S 5L8  
[REDACTED]

Important Notice: This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify me at [REDACTED] immediately by email and destroy this communication. Thank you.

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 12:32 PM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle

-----Original Message-----

From: Brian Kendrick <[REDACTED]>  
Sent: August 4, 2022 12:03 PM  
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
Subject: Missing Middle

Dear Mayor and Council.

I am writing to express my opposition to the Missing Middle initiative,

The problems in this city are not with the concept of zoning and the principle of a rezoning process, but with the administration thereof.

This issue is that the bureaucracy at Number 1 Centennial Square moves at a glacial pace. That the North Park project referenced in a recent OpEd by the Mayor took 2 years to process is an indicator of inefficiency in the process, not a fault of the principle of rezoning.

It may be possible to expedite a planning approval, and still get stuck waiting for a Building Permit. The project at 1224 Richardson has been waiting a year for one.....and it is affordable housing. I know of a building permit that was delayed because Parks and Streets could not agree on the angle of driveway flare, over a boulevard. Bureaucracy is choking the city in all departments.

This new policy will inevitably result in a new round of property speculation, that can only provide housing at market rates. Forget affordable, or even attainable new housing, and say hello to increased property taxes.

Please clean house before passing any paradigm shifting bylaws.

That which is founded in Dogma and supported in Rhetoric is doomed to failure.

Regards

Brian Kendrick

A 35 year Fairfield resident, who fears being tax squeezed out of our home.

**From:** b norrie [REDACTED]  
**Sent:** Thursday, August 4, 2022 9:31 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative comment

Hi,

I am a house owning resident of Victoria and I wish to express my strong support for the Missing Middle Housing Initiative. I favour the Missing Middle zoning/ housing changes over the current zoning/ housing restrictions for the following reasons (amongst others);

1) The current system involves permits, complex paperwork and costs that are sufficiently high to make conversions or development of new duplexes, triplexes etc appealing only to existing corporate development companies. The resulting products are consequently relatively expensive, especially as companies are incentivised to make the most profit by designing and building toward the luxury end of the market.

Reducing or eliminating permits, delays, complex paperwork and costs will make conversions or development of new duplexes, triplexes etc far more economically viable for home owners and groups of friends who want to build an affordable project to live in.

2) Realistically, the economics of the present zoning system makes development of affordable low level dwellings by commercial developers impossible. Without implementing the Missing Middle Housing Initiative, only taxpayer subsidized, low level affordable housing developed and operated by local council and/or provincial government is feasible.

3) My 6000sf section is bigger than I need for my family of four. A well designed and quality construction two or three level townhouse with small yard and garage/ workshop on 3000-4000sf would be just as good with less maintenance. With an aging population, lower maintenance properties will become more important if seniors are to keep their independence.

4) Having lived previously in London, UK and in Vancouver, I can attest that city areas of townhouses/ 3-4 story apartments with public parks and close shops/ amenities are much nicer places to live than either dense towerblock areas (downtown Vancouver) or hauntingly empty/ closed off single family home areas.

I also hope that the City Council and staff realise that the Victoria neighborhood associations do not necessarily, or even generally represent the views of the people living in their community boundaries. I have been to several meetings and these associations appear to represent only the small slice of the community who have lived in the area for many years and wish it to never change. The community associations definitely do not reflect the views of the thousands of productive, caring people who would love to be part of the community if only appropriately sized and priced housing was available.

Regards,  
Brendon

[REDACTED]

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**From:** Barbara Rieti [REDACTED]  
**Sent:** Thursday, August 4, 2022 9:50 AM  
**To:** Public Hearings  
**Subject:** missing middle misses the mark

We are writing to register our disapproval of the “missing middle” proposal which purports to create opportunities for more affordable housing, but really only guarantees profit for developers and speculators. Density does not automatically translate to lower prices, and even if it did, a volume = lower cost model is not a good direction for the city to take. It disempowers communities (and plans which many people have put time and energy into), and would make the approval process unpredictable and opaque (not that it would be any of the public’s business, according to the initiative).

Take, for instance, the provision that city staff would control approvals. When we did a small renovation project on our home a few years ago, we interacted with the permits department a number of times, and often got contradictory answers and sometimes even wrong information. No record was kept of any conversation, including two meetings with the permit manager.

As an example of how this proposal disenfranchises would-be homeowners, take the case of corner properties. As sites for more multiple units, they would instantly become more valuable, so investors (not necessarily local) would snap them up. They may or may not rent out the current unit, but when they are ready to build up, the tenant is evicted.

Finally, we would like to address the timing of this proposal. Why is such a major piece of work (and we do mean “piece of work” in the pejorative sense) coming up in the middle of summer, when so many people are away or busy with company? Why is it coming before a council that is in the last days of its current configuration? Clearly, the hope is to rush it through. And clearly, we will not be voting for any candidate that supports it.

Thank you.

Barbara Rieti  
Martin Lovelace

1903 Brighton Avenue  
Victoria

**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:45 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle

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**From:** Brandon Williamson [REDACTED]  
**Sent:** August 3, 2022 9:21 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Lisa Helps (Mayor) <LHelps@victoria.ca>; Sharmarke Dubow (Councillor) <sdubow@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>; Sarah Potts (Councillor) <spotts@victoria.ca>; Ben Isitt (Councillor) <BIsitt@victoria.ca>; Jeremy Loveday (Councillor) <jloveday@victoria.ca>; Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>; Geoff Young (Councillor) <gyoung@victoria.ca>; Charlayne Thornton-Joe (Councillor) <cth Thornton-joe@victoria.ca>  
**Subject:** Missing Middle

Hello Mayor and Council,

I would just like to express my strong support for the missing middle proposal based on the following points:

1. We have not only a housing affordability crisis but also a housing availability crisis - even people with means are having a hard time finding a place to live and supply is not keeping up with demand. This is one small piece of the puzzle.
2. Single-family homes are the most expensive form of housing. Reserving over 70% of all the city's land for this exclusive use is an inefficient allocation of land and resources. Townhomes and houseplexes on average are more affordable, so these should at minimum be on a level playing field with single-family homes.
3. Increased density provides a wider array of benefits beyond the housing market - denser neighbourhoods are more vibrant, more walkable, create more demand for increased transit frequency, support a greater density of shops and services, and take pressure off exurban sprawl to provide regional housing supply, which helps preserve the intact forests and Garry oak meadows on the fringes of the Westshore which are being blasted and bulldozed for car-dependent sprawl at an alarming rate.
4. Cities (and other larger jurisdictions) around the world are moving in the direction of abolishing exclusive single-family zoning. Let Victoria be a leader, not a laggard, in this global movement.
5. Requiring that the city undergo a public hearing and that city council review and approve every small proposal to build a duplex is a complete waste of everyone's time in a growing city with much more pressing issues.
6. Current policies incentivize wealthy people to bulldoze single family homes to build larger, more expensive single-family homes. THIS IS GENTRIFICATION. We focus so much on the gentrifying effects of new multi-family housing that we forget to consider the gentrifying effect of the status quo, which is squeezing moderate income families out of these neighbourhoods. We're seeing this trend in Fairfield, James Bay, and Gonzales.

Nobody is suggesting that the Missing Middle proposal will provide affordability to the masses on its own in the short term. While the policy overlaps with many affordability and climate goals, it is not inherently a proposal about immediate affordability - it is a policy about housing form and type. Rejecting the proposal for not directly being an affordable housing program would be like rejecting a vehicle safety bill for not including emissions reductions targets - both are important but each can exist in concert with other important policies.

I spend a lot of my time engaged in ecological restoration. I like to think of the more diverse forms of housing that would be enabled with missing middle as being akin to the wide array of wildflowers that make up a diverse meadow. To me, a neighbourhood exclusively reserved for single-family homes is nothing more than a lawn.

Thanks,  
Brandon Williamson  
233B-1008 Pandora Ave,  
Victoria BC



**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 1:01 PM  
**To:** Public Hearings  
**Subject:** Fw: Please vote NO to Missing Middle

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**From:** Carolina Ashe <[REDACTED]>  
**Sent:** August 4, 2022 12:52 PM  
**To:** Lisa Helps (Mayor) <LHelps@victoria.ca>; Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>; Geoff Young (Councillor) <gyoung@victoria.ca>; Jeremy Loveday (Councillor) <jloveday@victoria.ca>; Charlayne Thornton-Joe (Councillor) <cth Thornton-joe@victoria.ca>; Sharmarke Dubow (Councillor) <sdubow@victoria.ca>; Sarah Potts (Councillor) <spotts@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>; Ben Isitt (Councillor) <BIsitt@victoria.ca>; Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Please vote NO to Missing Middle

Dear Mayor and Council,

I am writing to ask you to turn down the Missing Middle proposal. Following are a few of the many reasons:

- This matter was handled in a way that has caused divisiveness and contributed to the public's distrust and cynicism about Victoria's elected officials.
- Consultation for an initiative that will affect all residents of Victoria was miniscule – less than 1,000 participants.
- There is finally enough awareness among the general public to start a meaningful conversation on this topic.
- A change this monumental should not be made by the outgoing council in the last few weeks of its mandate.

I believe that a change of this magnitude should be an election issue and should be managed by the incoming Mayor and Council, as they are the ones who will have to deal with the consequences.

Please vote no.

Carolina Ashe, resident of Victoria

7-949 Pemberton Road

[REDACTED]

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**From:** Clayton Cowan [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:43 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative

Mayor & Council,

Please consider supporting the proposed Missing Middle Housing Initiative bylaws. The new bylaws will give our community tools to adapt quickly to shifting housing market conditions. Tools that could have helped avoid the current conditions that have forced several of my family members, friends, and neighbors to move to distant and more affordable cities. Tools that could have prevented the rapid increase in people living in vans and on the streets. The time for rapid change in our community is now.

Thank you,  
Clay Cowan  
1146 View Street  
Victoria, BC.



**Community Builders...**

**Building Communities**

August 3, 2022

Mayor Lisa Helps and Council  
1 Centennial Square  
City of Victoria  
Victoria, BC V8X 2W7

Dear Mayor and Council,

**Re: Missing Middle Initiative**

The Victoria Residential Builders Association supports the missing middle Initiative intended to make the best use of existing land for housing.

A review of properties at the BC Assessment Authority's website demonstrates that a large part of a home's price is tied up in the lot. For example, a Victoria home on an 11,620 sq ft lot was most recently assessed at \$1,309,000. The land is \$1,199,000 and the building is \$110,000.

More than 100 years ago in James Bay, homes were built on lots of 2,000 sq. ft. Many are now heritage homes in a walkable, compact community. Certainly there is room for more housing today on lots five times larger.

Portland, Oregon recently adopted a bylaw allowing up to six units on single detached lots. Yet in many of our local municipalities, a simple duplex violates zoning.

Recent data from the Victoria Real Estate Board reveal the demand for missing middle housing. Prices declined slightly for single detached homes and condos due to rising interest rates. However, townhomes were the exception, where sale prices continued increasing.

The shortage of missing middle housing is clearly evident in the most recent CMHC data. New semi-detached and row housing totaled zero, year-to-date in Central Saanich, View Royal, Saanich, Oak Bay, North Saanich, Metchosin, and Highlands.

As for affordability, Victoria is one of the slowest, most costly municipalities in which to build new housing. Any initiative to save time and money through rezoning will ultimately be reflected in more affordability than the existing environment.

If you require additional information, feel free to contact me at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read "Casey Edge".

Casey Edge  
Executive Director

[REDACTED]

---

**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:45 AM  
**To:** Public Hearings  
**Subject:** FW: Mmhi

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** cleo gagner [REDACTED]  
**Sent:** August 3, 2022 7:26 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Mmhi

Hello mayor and council,

I am writing today very much in support of the MMHI.

With Canada and Victoria facing a housing shortage this initiative is actually the bare minimum that the city should be doing. For far too long the city has allowed citizens too much power to slow down growth in Victoria.

As a capital city we need to embrace change and lean into growing the city to accommodate the professionals and families that live here.

I myself am professional with a family and struggle to find appropriate housing for my family of four.

Inaction is not an option. This should have been approved 15 years ago. We owe it to the people of Victoria to BUILD THEM HOMES.

We owe it to the children of Victoria to invest in housing so more than a privileged few can have an opportunity to stay.

The time for action is years ago. To put this off again for a week or a month is completely unacceptable.

Regards

Cleo Gagner

[REDACTED]

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**From:** Ibarra, Carolina [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:05 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

Mayor and Council,

I am writing to express my support for the proposed amendment to Zoning Regulation Bylaw Amendment regarding “Missing Middle Housing” that aims to allow houseplexes, corner townhouses and heritage conserving infill as described.

Housing of all types and across the housing continuum is required to meet the needs of our community. Our housing crisis is a complex matter that requires a multi-pronged approach to solving it. Missing Middle Housing will provide more options to families. This will also expedite the development process, and allow people who seek this housing type to move-into it, while freeing up rental spaces for others who need them. I cannot stress enough how a variety of housing across the whole continuum at multiple price ranges is needed to effectively address our community’s housing needs.

Thank you for your consideration.

Carolina



**Carolina Ibarra BA, MSc**  
**Chief Executive Officer**  
Pacifica Housing  
827 Fisgard St | Victoria, BC V8W 1R9  
*Unceded Coast Salish Territory*

[REDACTED]  
[REDACTED] [www.pacificahousing.ca](http://www.pacificahousing.ca)

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[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:46 AM  
**To:** Public Hearings  
**Subject:** FW: MMHI

-----Original Message-----

**From:** Caitlin McGuire [REDACTED] >  
**Sent:** August 3, 2022 5:11 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** MMHI

Hello,

Please consider this email one vote of citizen support for the MMHI. As a homeowner in the Gonzales neighbourhood, I support more density in the interest of affordability, community-building, and climate change resilience.

Caitlin McGuire  
Lillian Road.

**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 12:33 PM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Initiative

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**From:** C Meagher <[REDACTED]>  
**Sent:** August 4, 2022 12:02 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Missing Middle Initiative

Dear Mayor and Council

I have lived and worked in the City of Victoria for 50 years. My work has ranged from social work, private enterprise with two successful retail and wholesale businesses, property development, consulting positions to major builders, volunteer work in minor sports for 15 years in Victoria and Vancouver Island, and 4 years on the Civic Heritage Trust for the City of Victoria. I am an active businessperson and resident of the City of Victoria.

What the Mayor and 80% of the Current Council have done to the City of Victoria over the last 8 years is absolutely horrible. The misuse of your positions to achieve personal agenda has made the City of Victoria a mess and in my opinion just short of criminal.

I completely oppose your current initiative for the fairy tale "Missing Middle Initiative", and I fully agree with the statements of a letter sent to you from another concerned Victoria Citizen which I have copied below in italics for the record.

Sincerely Richard C (Chuck) Meagher

### **Copied Letter from another concerned Victoria Citizen**

*As you would be well aware, pursuant to section 115(a) of the Community Charter, the primary responsibility of municipal councillors is "to consider the well-being and interests of the municipality and its community". And, per section 116(2) "In addition to the mayor's responsibilities as a member of council, the mayor has the following responsibilities: (a) to provide leadership to the council, including by recommending bylaws, resolutions and other measures that, in the mayor's opinion, may assist the peace, order and good government of the municipality".*

*In this context “A municipality is a corporation of the residents of its area” (see 6(1) of the Community Charter). In other words, **ALL** residents. Not just those who find housing to their liking unaffordable in Victoria. (Incidentally and obviously, this issue exists in every city in the world and always will.)*

*The “missing middle initiative” now before the mayor and council is not “in the interests of the municipality and its community.” It is only designed to benefit a small minority, and to entirely remove public consultation prior to approval of development in many instances. And, what is still more galling is that it isn’t even clear if even the objective of providing more affordable housing stock could actually be achieved by it, and if so, to what tangible extent, if any. This whole initiative is based only on speculation. Further, as was so blatantly illustrated by the City’s responses to the many questions posed by Susan Simmons in her July 11, 2022 email to you, you haven’t bothered to even consider the potential adverse impacts of it on a myriad of other matters critical to the livability, safety, health and economic viability of our capital city. That is bad governance in the extreme.*

*This initiative, if proceeded with, would totally change the whole of Victoria forever, in primarily negative or entirely unforeseeable ways. It is unconscionable for a mayor and any councillor who is not seeking re-election and the other members of council who may very well be looking for other jobs in ten weeks, to pass such drastic measures now. If the next mayor and council still feel that this should be advanced, then leave that to them to pursue after more careful thought and public input.*

*Regards,*



**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:24 AM  
**To:** Public Hearings  
**Subject:** Fw: Missing Middle Housing

---

**From:** Colin Merriam [REDACTED]  
**Sent:** August 3, 2022 3:00 PM  
**To:** Lisa Helps (Mayor) <LHelps@victoria.ca>  
**Subject:** Missing Middle Housing

Dear Mayor Helps,

Thank You all for your hard work and your willingness to take on bold initiatives to address the many challenges our city faces.

I believe that creative solutions are needed to combat the affordability crisis, however I am greatly concerned by many aspects of the missing middle housing initiative:

- 1) Despite the engagement undertaken, there is very poor community awareness of this and the implications on the community. Virtually no one I speak to in the community understands this is happening and is taken back when I mention some basic points of what is proposed. Something of this scale needs widespread community awareness, and that simply has not happened.
- 2) Allowing 3 full stories is significantly out of character with the neighborhoods, creates major privacy overlook conditions, isn't even consistent with the stated design guidelines, and would come at a complete shock to the neighbourhoods when constructed to this size. In an information session it was stated by staff that this was a result of early engagement feedback. Comments from a few individuals in early engagement is not at all representative of how the community views this.
- 3) The missing middle needs to provide a housing type that differentiates itself in a meaningful way from a condo. The houseplex model is simply a small condo building, this is not the middle, it is just increasing the condo supply. The fact that these condos are within a unique building type is unimportant and besides the point.

For these reasons I do not support the missing middle initiative as currently proposed. Please don't do an outgoing council "mike drop" only for there to be major backlash and have the whole thing repealed. Get the details right, or we will just be going backwards.

I know you are past the point of alternative suggestions but I strongly believe in the below strategy as a simple way of increasing housing supply in existing neighborhoods, which retains neighborhood character, provides an actual middle housing option, and gives existing owners a financial mechanism to realize them.

- Allow a minimum lot size of 2,500sf at a 25' minimum width frontage
- This allows for a typical 50'x100' lot to be subdivided down the middle
- Two modest sized ground oriented homes each with secondary suites can then be created
- Construction of a new home can be financed by existing owners through the sale of the other half of the lot

- Existing setbacks to neighboring properties can be maintained, allow a reduced interior lot line setback which only affects the other newly created lot
- Existing neighbourhood character is maintained through no increases to height, or reductions to rear yard setbacks
- These lot sizes have precedent in other major cities

Colin Merriam  
2736 Scott Street

[REDACTED]

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**From:** Craig Robert Rosario [REDACTED]  
**Sent:** Thursday, August 4, 2022 9:34 AM  
**To:** Public Hearings  
**Subject:** Missing Middle public hearing

Dear Mayor Helps and City Councillors,

The Missing Middle Initiative (MMI), as it is currently proposed, is flawed and incomplete, and I respectfully urge you to delay approval in order to make the MMI **an election issue**.

It feels like the city is rushing to make such an important, long-term decision in order to beat the election clock. MMI will only serve to make developers and some existing homeowners even richer without any guarantee of creating affordable housing.

I am concerned about the relationship between developers and certain members of council. I wonder whether developers are promising personal benefits to members of council who support MMI. It will be interesting to see where Lisa Helps ends up working after her mayoral terms ends.

Key reasons why a decision on the MMI should be delayed:

- Inadequate engagement
- Lack of public understanding of the policy
- Flawed and incomplete
- No affordability component built in
- No protection for existing renters
- Required a clearer vision for the reduced parking requirements for 6-unit buildings (will residents be charged to park on streets?)
- Requires integration with broader municipal and provincial policies for housing, renter protections, transportation and infrastructure
- No speculation mitigation strategy
- Requires more research on the risk of local government delegating away their ability to “level the playing field” when it comes to development
- Requires more research on the impact on property taxes (not just a homeowner issue as these costs are typically passed down to renters)

Thank you for considering my comments.

Craig Rosario  
932 Foul Bay Rd  
Victoria BC V8S 4H8

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 10:24 AM  
**To:** Public Hearings  
**Subject:** FW: Every. Lot. In. The. City?

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**From:** Carolynne Rykhlo [REDACTED]  
**Sent:** August 4, 2022 10:04 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Sharmarke Dubow (Councillor) <sdubow@victoria.ca>; Sarah Potts (Councillor) <spotts@victoria.ca>; Ben Isitt (Councillor) <BIsitt@victoria.ca>; Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>; Charlayne Thornton-Joe (Councillor) <cth Thornton-joe@victoria.ca>; Jeremy Loveday (Councillor) <jloveday@victoria.ca>; Geoff Young (Councillor) <gyoung@victoria.ca>  
**Subject:** Every. Lot. In. The. City?


Subject: Every. Lot. In. The. City.  
Posted @TalktoARYZE 16 hours ago via Twitter

Tweets Tweets & replies Media Likes

Tweets Tweets & replies Media Likes



**Luke at Aryze** @TalktoARYZE · 5h ...  
Every. Lot. In. The. City.

 **wohnBAUMoffensive** @hol... · 13h  
why is it that 6-plexes in the US never look this good?  
  
this project by dietrich untertrifaller is \*stunning\*  
  
solar protection  
functional balconies  
3-pane windows  
mix of unit sizes (1-3 bedrooms)  
massive lift-slide doors  
no vinyl windows  
  
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look this good?  
  
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functional balconies  
3-pane windows  
mix of unit sizes (1-3 bedrooms)  
massive lift-slide doors  
no vinyl windows  
  
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[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 10:23 AM  
**To:** Public Hearings  
**Subject:** FW: MMI - please press pause

-----Original Message-----

From: Christine Smart [REDACTED]  
Sent: August 4, 2022 10:11 AM  
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
Subject: MMI - please press pause

Good Morning Major and Council,

Please press pause on the MMI - especially with the recent governance review I think it's an important time for council to not rush such significant change and re establish trust with the residents of Victoria.

I'm very concerned about "land lift" and displacement of renters and home owners.

If something is worth having, it's worth waiting for and getting it right.

thanks for listening

Christine Smart  
James Bay  
[REDACTED]

[REDACTED]

---

**From:** Dee M [REDACTED]  
**Sent:** Thursday, August 4, 2022 9:38 AM  
**To:** Public Hearings  
**Subject:** Missing Middle

Hello - I have been a resident of Victoria/OakBay for almost 30 years - I've lived in Fairfield and Fernwood, and now James Bay. I fully support the Missing Middle Housing Initiative.

Thank you,  
Deidre Matheson

Sent from my iPhone

[REDACTED]

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**From:** Duncan McIntyre [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:50 PM  
**To:** Public Hearings  
**Subject:** Public Hearing August 4, Missing Middle Housing

Good afternoon,

Having read the proposal, we would like to express our support for the proposed changes to the OCP and the Zoning Regulation Bylaw. These changes represent a necessary step in allowing Victoria to develop in a way that produces a healthy urban environment and a good first step in relieving the housing shortage. We hope to see more community plan and zoning changes aimed at different forms of densification and progress toward mixed-use walkable neighborhoods. In addition to the short-term goal of addressing the current housing crisis in Victoria, densification and mixed-use neighbourhoods align with Victoria's long-term goals of sustainability, low-carbon planning, and climate change resiliency by reducing car dependency and increasing home energy efficiency.

All the best,  
Camille Zimmer and Duncan McIntyre,  
Residents, 4-1025 Carberry Gdns. V8S 3R8, Victoria



[REDACTED]

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**From:** Dale Reynolds [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:16 PM  
**To:** Public Hearings  
**Subject:** Missing Middle - my comments

Agenda Item: Missing Middle  
Name: Dale Reynolds  
Address: 1107 Summit Ave.

Dear Victoria City Council and Mayor,

I am writing to express my opposition to the Missing Middle Zoning Initiative. I do not believe that the proposed densification of residential areas will address the housing needs in Victoria.

Your assumption is that more units will result in more affordable housing and make it easier for local renters and buyers to find homes. I believe that the solution you are proposing will not help with the housing crisis, but only change the landscape, environment and pressures in our city.

Victoria is geographically constrained and only so many more homes, regardless of size, can be accommodated. Competition for new homes will be high as more Canadians and International citizens see the opportunity to buy in Victoria. Market forces will ensure the "Missing Middle" units are expensive and the population of Victoria will grow due to an influx of people from other locations in Canada and abroad. Local families and seniors will continue to be priced out of the market, and conventional homes will be astronomically priced based on the development potential of the land.

Allowing 6 or 12 units per building lot will definitely achieve high density living in Victoria neighbourhoods. It will not however relieve market pressures and make it easier for local people to find homes. I believe we only need to look to Vancouver to see how densification does not result in affordability.

Thanks

**Dale Reynolds**

[REDACTED]

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**From:** Hartsmith [REDACTED]  
**Sent:** August 4, 2022 8:22 AM  
**To:** Public Hearings  
**Subject:** Written submission: Missing Middle - public hearing will be held this Thursday, August 4, 2022

I understand and thank Mayor and counsel for their service and attention to the housing challenge in Victoria.

I ask Mayor and counsel to defer this vote to allow the candidates to present their ideas in the upcoming election. This would not be a cop out but rather faith in the democratic process.

My position is that the proposed changes in zoning is not a good idea as it will potentially solve one problem - increase supply while creating others - a hodge bodge of development. Developers who present as empathetic have an economic interest in this proposal. If we attend tot he quality of what is build and assert controls we can use a measured approach.

We need to manage the corporate investors who are buying up affordable apartment rental buildings who are seeking higher return on investment. This may require a strong partnership with the provincial government. If these developers are allowed to move in and increase rents to market levels we will see a decrease in supply of affordable rental homes. Let's do what we can to limit this.

Offer more coop housing zoning and make it easier to find land and properties to do this. If developers were so altruistic they would build coops.

The proposal could be amended - to limit it to targeted areas - to see how it works Vs the blanket. In this way we can mitigate the risks of this proposal and learn as we go.

We need calm reasoned approach where democracy prevails.

Thank you,

Drew smith

**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:48 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Housing Initiative - my earlier letter

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**From:** Dave [REDACTED]  
**Sent:** August 3, 2022 2:04 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Cc:** Karen Hoese <KHoese@victoria.ca>  
**Subject:** Missing Middle Housing Initiative - my earlier letter

Dear Mayor and Council,

I just wanted to ensure that you still have my May 4 letter on the Missing Middle Housing Initiative, below.

Yours truly,  
Dave Thompson  
Victoria  
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May 4, 2022

Mayor and Council  
City Hall  
City of Victoria  
Sent by email to [engage@victoria.ca](mailto:engage@victoria.ca) and [mayorandcouncil@victoria.ca](mailto:mayorandcouncil@victoria.ca)

Dear Mayor and Councillors,

**Re: Villages and Corridors Planning and Missing Middle Housing Initiative**

I write regarding Villages and Corridors Planning (VC), and Missing Middle Housing Initiative (MMHI).

As I noted in my earlier letter supporting the City's Rapid Deployment of Affordable Housing (RDAH) proposal, increasing housing availability and choice within the City of Victoria - where people can live closer to employment, shopping and other destinations - will help to:

- Increase resident access to services and employment opportunities;
- Reduce labour shortages that are impacting businesses and causing shorter hours and closures;
- Enlarge the pool of customers for local small businesses;
- Reduce suburban sprawl, and the resulting clearcutting of forests, pressure on agricultural lands, traffic, pollution, and GHG emissions; and,
- Increase the amount of taxable property in the City, and thereby help support public services and reduce future tax increases for residents and businesses.

In addition to allowing and supporting more public, co-operative, and other forms of non-profit and below-market housing (RDAH), we need to enable housing generally that is attainable for workers, young families

and others who are being shut out by the rapid increase in home prices. Victoria is not producing more land, so this will need to be done through creating homes on our existing land base - doing more with what we have.

It has become very clear that the provincial government is considering reducing the ability of municipalities to restrict housing, and requiring municipalities to allow more new housing. Obviously a one-size-fits-all approach is less than ideal, and the province may leave more autonomy in the hands of municipalities that proactively allow more housing. I urge Council to be a leader in enabling more of all types of housing, so that Victoria is well-positioned to retain more autonomy to shape development to fit our unique municipal needs and goals.

I hope to see the City advance and make improvements to VC and MMHI as these initiatives proceed to later stages and implementation (whether the improvements are within these initiatives or in complementary policies).

For example, we urgently need to **prevent displacement of more renters** - the majority of Victoria residents - into homelessness, core housing need (already affecting over 20% of residents), or needing to leave the City for housing. Displacement is already happening, even without these initiatives that will create more housing, and we need to fill renter protection gaps left by existing policy frameworks of the Province and the City. I urge the City to look at best practices (e.g. Burnaby) and make various adjustments as needed. We don't need to sacrifice improved housing supply or renter support; we can do both.

The City needs to **allow more homes within walking distance of transit stops** and other amenities. This will help provide better transportation choices to people who do not own cars, improve transit ridership and revenues, and enable much-needed transit service improvements. This said, it is important that the finalized version of VC not be restricted to just concentrating new homes in narrow strips adjacent to busy roads (heavy motor vehicle traffic has adverse health and wellbeing impacts, particularly for children, seniors, people with disabilities, and other vulnerable community members).

While allowing more housing, Victoria can and should **protect urban parks and other greenspaces, expand them, and make them more usable for more people** - particularly in areas underserved by such spaces. We also need to **make greenspaces around new homes more usable to children and families**, which could include more flexibility for owners to allocate sizes and uses of front and back yards, and to reduce or eliminate paved surfaces on their properties.

The City should also allow more **flexibility for homeowners who wish to contribute to the supply of affordable housing**, for instance allowing house conversion rules to apply to a wider range of houses, and allowing homeowners to install an extra rental suite (above current allowances) along with the extra space that it requires.

Finally, as I noted in my letter on RDAH, the City can adjust or change course in the future if needed. In the meantime, the City needs to act with the appropriate level of seriousness and urgency to address the housing crisis.

I look forward to seeing the final products of the RDAH, VC and MM initiatives, and to seeing more housing choices, more protection of renters, and a more vibrant, healthy and livable Victoria.

Yours truly,

Dave Thompson  
Victoria

Cc. Karen Hoese - Director of Sustainable Planning and Community Development [KHoese@victoria.ca](mailto:KHoese@victoria.ca)

**From:** Emily MacNair <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:30 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Written Comments

Dear Mayor Helps and Council,

I am writing with regard to the Missing Middle Housing Initiative.

Finding ways to increase housing affordability and improve access to suitable housing is a high priority but the current Missing Middle proposal is too simplistic in its approach. Taking a blanket approach to zoning assumes that all parts of the City of Victoria are the same, all streets are the same, and all specific locations are the same. But there are many considerations and values at stake in planning and development decisions.

The proposed approach assumes that the value of increasing housing stock trumps all other values. This has been the primary driver of an increasing number of decisions across Greater Victoria and the region is not better for it. I think for many of the residents of the City of Victoria, this is not the only value they consider when they contemplate the future of the City. Development and increasing housing stock appear to be the sole focus of the current Council and Mayor, and it is no doubt also the only value of developers who stand to profit with less regulatory headaches.

Whether or not a particular type of housing or building is suitable in a particular location – whether it improves the street, improves the health and quality of life for the existing residents of a street or a neighbourhood – I believe these values matter. The existing community and the existing environment in a place matter.

The proposed Missing Middle approach makes a false comparison between current zoning and Missing Middle regulations. The comparison is false because it's quite likely that whatever home exists on a lot is an older home that isn't built out to the maximum allowable footprint with current zoning. This comparison makes it seem as though the proposed changes are minor. But in essence they open the door to many more lots being built out to the maximum allowable extent. Many more lots and locations will become prospective development opportunities – and many more construction projects will fundamentally change streets and neighbourhoods.

Every time development occurs – every time a lot is “re-developed” - we lose a certain amount of green space that was previously serving as a carbon sink, as urban habitat for plants, insects and birds (and sometimes even other creatures). This is because most older homes are smaller, and their building footprints are smaller. So the footprint of those homes may be very different from what will take their place with the new “missing middle” regulations. Whether the loss of that green space is due to a monster single family home, to a larger home with a laneway house, to “houseplexes” or townhouses or infilling – this creates the same outcome – the incremental loss of green space that is being tremendously undervalued.

Every square inch of green space – undeveloped and unpaved land – that is lost, depletes our ability to adapt to climate change and reduces the health of our urban environment. There is a mono-minded focus on counting trees when we should also be looking at the soil and at all types of green space – at the land that isn't covered by buildings and paving. Single trees cannot thrive or provide the ecosystem functions we require. We need all of the green space we can possibly retain and reclaim - back yards and front yards and side yards. These areas serve such a critical function. While governments give lip service to nature-based solutions as the way forward, we give over more and more land to buildings and impermeable surfaces. If we wish to protect ourselves from the worst effects of runoff in more intensive rainfalls and the consequences of extreme heat – we will start to place value on all our green space.

I don't object to densification or attempting to improve housing affordability. This isn't intended to be a purely negative commentary. It is a call to include additional values in planning and development and to avoid oversimplifying the approach. I believe in preserving our natural assets wherever we find them. Otherwise, we risk just creating a less livable city with more people in it. We need innovative housing solutions - ones that place the value of green space (in all its forms) at the heart of the planning and development process.

Sincerely,

Emily MacNair

871 Somenos St., Victoria BC V8S 4A7

[REDACTED]

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**From:** Gregory Owens <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 11:18 AM  
**To:** Public Hearings  
**Subject:** Missing Middle

Hello,

I'm writing to voice my support for the Missing Middle Initiative. I think it's a step in the right direction for reducing home prices. We need to increase housing density in the city to support walkable neighbourhoods.

Gregory Owens  
1034 Princess Ave, Victoria

[REDACTED]

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**From:** howard barker [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:40 AM  
**To:** Public Hearings; Jane Mertz  
**Cc:** Geoff Young (Councillor); Ben Isitt (Councillor); david.eby.MLA@leg.bc.ca; grace.lore.MLA@leg.bc.ca; Charlayne Thornton-Joe (Councillor); Jeremy Loveday (Councillor); Lisa Helps (Mayor); Marianne Alto (Councillor); Sarah Potts (Councillor); Sharmarke Dubow (Councillor); Stephen Andrew (Councillor)  
**Subject:** Re: Missing Middle - do not pass the bylaw please

Hello Public Hearings Office,

Please include the following submission to the public hearing on August 4<sup>th</sup>, 2022.

thank you,

Howard Barker

Dear City Councillors et al.,

I am the owner of a single-family home (SFH) in Fairfield and I am writing to you regarding your planned alteration to SFH zoning across Victoria. Would you be so kind as to provide me with answers to the following questions?

1. Attempts have been made over the past few years to create a “Missing Middle” (MM) housing category in several cities across the USA. While Victoria shares some of the problems faced by those cities, ours are much smaller in magnitude. As far as I can tell, it is too early to accept or reject the hypothesis that measures to create a MM in American cities have achieved their goals. If City Council knows of studies that confirm or reject the efficacy of these American rezoning measures, please forward them to me?
2. If you are unable to fulfill the request in (1), could you explain to me how you have concluded, a priori, that what is believed, by some, to be needed for American cities, which are in “dreadful shape” on many fronts, is also needed, and good, for Victoria?
3. Your planned rezoning measures seek, explicitly, to increase the density of Victoria’s population. Under your plan, population density and average property size could increase and decrease, respectively, very much. But how much is too much? I am sure you are aware of the plethora of academic studies that document the largely negative ramifications of high population density? These include more noise bylaw violations, less efficient modes of transportation (including bikes), more mental health problems (in all mammals actually, not just Victoria’s humans), more crime, and diminished environmental “quality” (by increasing all varieties of pollution and reducing green-space; despite vague claims to the contrary). Could you please provide me with a benefit-cost analysis that shows that the hoped for goals of increasing Victoria’s population density will outweigh the collective rise of collateral problems?



4. In talking recently with numerous young people (i.e., under 40 yo), their overwhelming concern is not an inability to own property in Victoria, it is the high cost of rental accommodation. This sentiment is not restricted to Victoria, and it is not limited to the 2020s, though Victoria is up there. Many of these people, a lot of whom are in the fairly transitory service-sector, actually neither plan nor expect to live in Victoria much beyond a few seasons, or years at most. They expect to rent, as I expected to in Toronto 40 years ago, but are finding this to be extremely difficult when BC's landlords are perfectly free to make a capital-gains project out of their lives by endlessly raising rental rates in the face of an accommodation problem? I know this falls in the lap of the Provincial Government, but could someone please provide me with an explanation as to why the Province of BC does not either impose a strict "rent control" system or allow Municipal Governments to impose such laws locally? It seems to me that compared to an experimental obliteration of SFH zoning, "rental-rate caps" would be a much fairer and straightforward means of helping address Victoria's rendition of the affordable housing problem.

Sincerely,

Howard Barker  
55 Howe St.  
Victoria BC  
V8V 4K2

On Tue, Aug 2, 2022 at 6:59 PM [REDACTED] wrote:

Hello,

Attached is a letter outlining why I think the Missing Middle should not go forward as policy/bylaw for the City of Victoria.

Please include this in the submission to the public hearing on August 4<sup>th</sup>, 2022.

Regards,

Jane Mertz

Fairfield in one of those pesky single-family homes

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 12:33 PM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Housing Initiative

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**From:** Helen Zeilstra <[REDACTED]>  
**Sent:** August 4, 2022 11:51 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Missing Middle Housing Initiative

Exactly what do you hope to achieve through the missing middle housing plan? What is the problem and what is the end goal?

Please consider how induced demand will affect this plan. Once all of the single family dwelling plots are consumed, and families are forced to pay mortgages imposed by high priced development, what land will we develop then? Where will the new arrivals go? Did we learn nothing through the homeless experiment of 2020/21?

This initiative/ experiment will require changes once approved. Changes will be made no matter who/ what is negatively affected. For example, it seems Mayor and Council have little intention to step aside as MMI directs but rather are now directing staff to restrict entitlements after the fact (Council mtg July 14, 2022). Why did this change without giving voters proper notice? This is not good governance, and a great example of why I don't trust anything you people pose.

The most insulting part of this is to give this pungent mess to the new Mayor and council to figure out after Oct 15, 2022.

Stop already. As a homeowner that could easily profit by a million or more with MMI, I'm calling on you Lisa Helps and Council to put the brakes on this foolish experiment. Reject MMI fully today.

Helen Zeilstra  
2829 Scott Street  
Vic. BC. V8R4J5

**From:** Holm - Verhaegen [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:51 PM  
**To:** Public Hearings  
**Subject:** 'MMHI' public hearing - - 'NO'

Dear Mayor and Council,

I do **NOT** support the Missing Middle Housing Initiative, for the following reasons:

**AFFORDABILITY / TARGETING THE NEW HOUSING FOR CERTAIN POPULATIONS:**

Allowing density does not lead to greater affordability without requiring it as a condition of upzoning.

Missing Middle townhomes will likely cost \$900,000+ as a starting point (small but up-market new-build townhomes opposite me sold for \$1.8 million). These homes are out of reach for the majority of first-time home-buying residents living in Victoria and the CRD.

Adding new supply increases the price of existing homes nearby in the well-recognized process of gentrification.

MMHI is being sold as a way to “allow plentiful and affordable housing to be made available for Victorians”.

*Yet the City does not control who can buy and rent housing based on their type of profession or other attributes. Presenting it as otherwise is deceptive. There is no guarantee or mechanism in place that can allocate the new housing to the so-called desired cohort: “people we need to attract to and keep in our communities – doctors, nurses, police officers, tradespeople, and others who are essential to our community wellbeing and economy”.*

There is every likelihood that many of the new, so-called ‘affordable’ units will simply be snapped up by out-of-town buyers from the Lower Mainland, Alberta, Toronto and so on, who are cashing out from where they live in even more expensive communities or from lucrative careers, and can outbid most locals on any available housing.

The City’s financial analysis calculated that new houseplex units could sell for \$653,000 to \$1.3 million, and townhouses from \$674,000 to \$1.7 million. While those prices don’t meet official definitions of affordability (30 percent of median income), they are more affordable than the average \$1.2-million Victoria house. That’s good for well-paid professionals seeking alternatives to condo towers—and potentially great for homeowners selling their land to a Missing Middle developer. But it does nothing for regular working folks unless new wealth from increased land prices is captured and turned into affordable housing, says the BC General Employees Union, which has criticized Victoria’s plan.

What’s to prevent many of these additional units simply being used for short-term rentals? The City is currently unable to adequately control or police the use of STRs in Victoria and the impact they have on long-term housing availability.

It seems that Victoria’s Missing Middle proposal as currently structured will simply make developers and land speculators richer, without delivering on affordability.

**CURRENT OCCUPANTS / RENTERS:**

There are no concrete protections for people displaced through the Missing Middle Housing Initiative, as existing housing stock is removed and improved.

Although more than 60 percent of the City's residential land is technically zoned for single-family houses, many people live in those areas in garden flats, accessory homes, duplexes, and collectively in older houses or in houses carved into suites. Missing Middle could flatten these often-affordable rental homes, causing "displacement"—that is, putting their tenants out on the street.

### **PROPERTY TAXES:**

The City of Victoria has not reviewed the impact of its Missing Middle Housing Initiative policy on city taxes (according to communication received from City staff).

It can be fully expected that the City will eventually seek to tax residents on the 'best and highest usage' of their recently-upzoned property, whether they choose to redevelop it or not, causing hardship and a significant increase in their cost of living.

### **COMMUNITY INPUT:**

MMHI approvals will be made by staff, with developers able to avoid Council, community association and public input.

Who are the people who will make the decisions, what are their qualifications, and who will they be accountable to? The public should have a process to express an opinion on a development that affects them.

Should the Missing Middle Housing Initiative go through, residents will not long have a say in where multiplexes go or what they look like in their immediate communities.

MMHI will create millions of square feet of new density across the City, while surrendering the control our elected officials currently have through rezoning to demand greater affordability or tenant protections. Current homeowners will get no notice of what's being built beside them, aside from what's posted on the City's development tracker, and if they don't like it, they will have no avenue of appeal aside from going to court.

### **JUST A STARTING POINT:**

If blanket-upzoned, the suggested heights, setbacks and usage are simply a suggested starting point for developers. They will almost always seek variances in height and setbacks. If we have multi-units by right, what's a few extra metres up or out? Land assemblies will be goal, and extra storeys will be requested and received, well beyond what is being presented to the public with this initial Missing Middle Initiative.

The Urban Development Institute (UDI) has already called for the MMHI policy to be relaxed, which should make citizens question Council candidates: "If elected, will you let Missing Middle go to four or more storeys?"

### **LAND LIFT:**

The value of the land under a home will greatly increase. And it doesn't seem to help if you add new density to the land hoping to dilute the "land share component" of the purchase price of the new home. *Vancouver evidence clearly shows that as density goes up, so does land price.* No advantage is gained for the purchaser or renter.

No other city centre in North America has approved and built more new housing units per capita than Vancouver. Vancouver has increased housing units by 66 percent since the 1980s, moving residential density from 3,300 units per square kilometre to 5,500 in those 4 decades. This makes Vancouver the highest density city in Canada. If high housing prices could be solved by adding supply to an existing land base, Vancouver should rank among North America's most affordable cities. Instead it is the most expensive.

### **PARKING / TRAFFIC INCREASE:**

The City's plan requires Missing Middle projects to have just one parking stall (for disabled residents), with an option to add a second for a car-share vehicle. Since anyone paying \$1 million for a new townhouse will likely

own a car (or two), the City's also considering a pay-permit system to limit parking on residential streets. There will be more traffic, and an impossible street-parking situation.

The Missing Middle Housing Initiative proposes to provide less parking spacing than currently available as a way of supporting a 'car-lite' lifestyle. It will not provide more public transit nor does it include the development of amenities within walking distance to new Missing Middle housing, both of which are required to achieve a 'car-lite' lifestyle.

Wishing away vehicle use is very problematic. Young-to-middle-aged families in particular seem very car-dependent, yet you are ostensibly targeting this plan as 'family friendly'. They are usually juggling two jobs, transportation to daycare, schools, sports, medical visits, probably helping elderly parents on occasion, and for outings/holidays. Expecting that this will change by simply not planning for car ownership along with the new proposed denser housing seems very problematic. Even if people manage to reduce their usage of vehicles, they often have a vehicle that they use *sometimes*, so therefore need a place to park it. Introducing a pay-permit system for street parking will disproportionately affect lower- to middle-income residents and detract from any 'affordability' offered by the housing.

A lack of more public transit options and the lack of more amenities within walking distance to new Missing Middle housing is a flaw in the Middle Housing Initiative planning. The plan seems to be simply for developers to be able to build Missing Middle housing in place of single-family homes without having to request a zoning change from the city and residents.

#### **NEIGHBOURHOOD CHARACTER / HERITAGE:**

Will the look and feel of new Missing Middle housing developments suit the character of the neighbourhood?  
Will Missing Middle support conservation of heritage and re-use of character homes?

The Hallmark Society – *Dedicated to Preserving Historical and Architectural Landmarks in the Capital Regional District since 1973* – says 'no'.

With no input in proposed redevelopments, existing residents will no longer be able to express an opinion as to the suitability or desirability of changes in our neighbourhoods.

There are very few character homes left after decades of redevelopment.

Missing Middle could also accelerate the destruction of Victoria's diminishing number of old character homes. The City has included a "heritage conserving infill" option in its plan, permitting owners of older homes to build extra housing on their properties if they agree to heritage designation on the main house. But as former councillor Pam Madoff points out, "When you look at what would be allowed versus the size of most lots, because most of these are in the inner city, you can't do much more than maybe a garden suite." That won't create enough income to justify renovating an old house, so some owners will tear it down and build new.

#### **NOT MISSING!:**

'Missing' Middle is not missing.

My neighbourhood is full of 'missing middle', on every single street. There are 3,4,6-storey multiplexes, high-rise buildings, townhouses, 6-plexes, 4-plexes, triplexes, duplexes (by right), and single-family homes with rental suites. Condos and rentals (luxury, mid- and affordable). There are plenty of Airbnbs! There are SROs, hallway-houses, supportive housing, social housing, numerous senior care homes, office buildings, hotels, government buildings, the Coast Guard, cruise ship dockage and transit hubs (ferries, helicopters). There is retail and services.

**Missing Middle has already happened here, yet it was done WITH immediate neighbours, communities and Council having a say.**

Many dwellings which appear single-family are, in fact, multi-family in reality.

According to an answer received from City staff, the City does not know how many single-family homes are currently multi-family dwellings or how many people live in them. They are looking at moving forward with a far-reaching policy without understanding who it will impact.

**TREES / URBAN FOREST:**

New development would lead to the loss of a significant number of residential trees in our urban forest. The Tree Protection Bylaw states that a tree may be removed if the trunk of the tree is located within the building envelope and the removal of the tree is necessary for the purpose of constructing a building and property owners will be required to pay \$2,000 cash-in-lieu for each replacement tree or tree seedling that cannot be accommodated on the site.

There is no protection for the urban forest our tree canopy based on the current proposed policy. *An important proportion of Victoria's urban forest and tree canopy is found in the Traditional Residential areas, both as street trees and on private property. These areas also display a diversity of topography which may include varied soil types and rock outcrops. Some fall within important ecosystems, such as Gary Oak meadow. – City of Victoria.*

Comment: Missing Middle housing plan threatens Victoria's trees. – Times Colonist, May 16, 2022

Located in Fairfield Victoria, Rhodo is a collection of 2, 3 & 4 bedroom townhomes built by Aryze Developments. From the image below you can see the trees that have been removed from the two properties where these townhomes were built.

“What was once two heavily treed lots were completely clear cut and only one original tree was left in the new development. Indeed since the buildings extend right to the edge of the property there is no room left to replace even a fraction of what was lost.” – *Anonymous community member*

The plan has reduced parking to allow more greenery around Missing Middle projects, and the City already has a bylaw protecting large trees. But that bylaw doesn't protect trees on allowable building footprints, and since the plan is designed to spur new construction, it will encourage developers to build to the maximum allowable (40 percent), and thousands of mature trees currently on residential properties would get chopped.

**FAMILIES:**

Victoria is especially touting Missing Middle as a way to keep young families in the City, in part because it requires 30 percent of every Missing Middle project to consist of three-bedroom units. Yet building 3-bedrooms will not, in and of itself, make it affordable for families. It is more likely that a 3-bedroom (which will be expensive) will be purchased by future buyers who are cashing-out of Toronto or Vancouver, and wanting the extra room for a home office, personal gym/yoga room, or hobby room. As the City cannot control who buys any given residence, it will go to the highest bidder, who may not be a 'family with children'.

**DENSITY:**

Under the City's plan, six-unit houseplexes totalling up to 5,600 square feet and 10.5 metres (three storeys) tall will be possible, containing 75 percent more square-footage and three metres taller than what's currently permitted for single-family homes. If you live in a bungalow next door, say hello to your new neighbours and goodbye to the sun.

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For these reasons, I do NOT support the Missing Middle Housing Initiative as proposed.

Thank you.

Ingrid Holm  
559 Michigan St  
Victoria, BC

Mayor Helps

THIS

Will be the result of the Missing Middle Initiative?

MAYOR'S OFFICE

AUG 04 2022

VICTORIA, B.C.

A POORLY DESIGNED 4 house-plex resulted in the loss of this mature maple.

*It's huge canopy had cooled our homes and streets by up to 20° C; provided shade, bird habitat and stress relief. Heat mitigation is essential and trees are our greatest natural asset.*



If this maple had lived 20 more years, it would have captured 2500 kg of carbon, absorbed 14,700 litres of storm water, and intercepted 375,900 litres of rainfall.

**PROTECT OUR MATURE TREES**

Why are we not requiring good design?

Make a mandatory review of the Missing Middle Initiative after one year.

Spokane, Wa has just approved a similar zoning change but for one-year with a mandatory review.

*Jan Furbrook  
1309 Balmoral Rd*

[REDACTED]

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**From:** Joni Hockert <[REDACTED]>  
**Sent:** August 4, 2022 7:45 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

To Whom It May Concern:

My husband and I dearly love Victoria as do many others. We love the quiet streets, the gorgeous tree canopies, the walkability, the various options for shopping, eating out, or just having a glass of wine. By instituting the "Missing Middle" initiative, the Victoria we love would be destroyed.

What I value the most about living here, is the sense of community. We know all of our immediate neighbours and we have supported each other in a multitude of ways over the years. If our home is knocked down, dozens of people could move in. Followed by dozens more. I have lived in a densely populated city (San Francisco) and can tell you people seldom know their neighbours, there is usually no support between neighbours, and there is a sense of coldness that creeps into life. The result is isolation, not a vibrant community. Don't do this to our beloved Victoria. The only ones who would benefit are the developers....yet again.

Kind regards,

Joni Hockert  
Jeffrey Waite



[REDACTED]

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**From:** Jean Johnson <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:44 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

Victoria Mayor and Council:

I do not support the Missing Middle Housing Initiative in its current form. There should be a way to combine densification with a livable neighbourhood for all...one that is green and welcoming...consistent with the scale of other homes...and affordable.

At the same time amendments are being suggested to neighbourhood plans without neighbours in some areas being given the opportunity to express their hopes and dreams...for housing that fits in with their neighbourhood... green space including parks...planning urban villages where we can get to know our neighbours; share a greater understanding of the current housing problems for all.

Regards,  
Jean Johnson

[REDACTED]

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**From:** JUDY LIGHTWATER [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:30 AM  
**To:** Public Hearings  
**Cc:** letters; news@capitaldaily.ca  
**Subject:** Missing Middle

I am shocked at the staff time, money, and public engagement used on a policy that so completely ignores affordability. Victoria, like many cities around the world, has documented that more housing does not mean more affordable housing. Rents and housing prices will only increase with Missing Middle. Who does that benefit? Investors and developers are already waiting to acquire lots and build with less red tape and higher profits. Who will live in 500 sq ft. homes that cost \$500,000+ and rent for \$3000/mo. +? Not anyone we know.

Judy Lightwater  
86 Howe St.  
Victoria, BC

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:44 AM  
**To:** Public Hearings  
**Subject:** FW: Missing middle housing initiative

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**From:** Jordan Royer [REDACTED]  
**Sent:** August 4, 2022 8:17 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Missing middle housing initiative

This email is to convey, in a personal capacity, my support of the MMHI initiative.

Best,

Jordan Royer

HBA/BSc. Eng 2014  
[REDACTED]

[REDACTED]

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**From:** Jack Sandor [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:56 PM  
**To:** Public Hearings  
**Subject:** MMHI

My name is Jack Sandor. I'm 23 years old, I'm an electrician (the one councillor Andrew mentioned in a hearing a few months ago), and I've had to move out of the city I lived in for the first 21 years of my life because I can't afford it anymore. I live in Saanich now, in a run-down, overcrowded house with four roomates, after being forced out of the community that raised me by rising housing costs. I'm writing this because I'm worried that council will continue to, as it has in the past, place the aesthetic concerns of highly privileged, wealthy, white homeowners over the short, medium, and long-term wellbeing of their most vulnerable constituents. Please pass this initiative.

As an electrician, I am intimately familiar with the way the housing market works and the effect of zoning laws. Passing this initiative will make it so that instead of replacing single family homes with larger, more expensive, more luxurious single family homes, they will instead be replaced by *more* affordable (though obviously still expensive) units. Much of the work I do now is on older single family houses that are being renovated to be much higher end, or straight-up torn down to build ultra-luxurious mansions in their place. Clearly that's a disaster for affordability and the climate.

The root cause of unaffordability is scarcity. The more abundant something is, the cheaper it is. By keeping housing scarce, we are increasing it's cost. Increasing the supply of housing reduces scarcity, which not only reduces prices, but also protects tenants! It's much more difficult to be strongarmed by bad landlords if there are other affordable options nearby. Pretending that maintaining housing scarcity is somehow good for tenants and not simply a continued gift to landlords and property owners is simply ridiculous.

The environmental benefits of density are both extremely well studied, and intuitively obvious. Making more efficient use of our land is an incredibly important part of the fight against climate change, and pretending that you can be an ally in that fight while opposing measures like this is simply absurd. The less housing stock we build here in Victoria, the more environmentally devastating clear-cutting happens in the westshore. If you want to object to this measure, you have to defend the inevitable environmental catastrophe of more suburban single-family sprawl. Given everything we know about the climate crisis, I think it's pretty reasonable to view opposition to density as, effectively, climate arson. Do the right thing for future generations, as well as those of us who will have to live on this planet for another 60, 70, 80 years.

Many people have complained about the number of additional vehicles this could add to the streets. Thankfully, there's a very simply solution to this problem; don't require parking! Basically every building constructed in the city has an ample amount of parking, there are tons of options for those who need a vehicle. Why force everyone to pay for parking, even when they don't need it?

This is a more minor point, but worth bringing up in my opinion. What's wrong with rowhomes and townhomes? They fit perfectly with the character of basically any neighborhood, and are actually seen as incredibly desirable in many other cities around the world, such as New York. Adding more options to the cities housing stock seems like an absolute no-brainer.

Myself and all my friends are paying very, very close attention to not just this initiative and this council, but the actions of councils all over the CRD. This issue affects us more than almost any other, and the inaction over the past decades is simply inexcusable. Stop prioritizing the wants of those who already have wealth and power. Stop destroying the planet by forcing growth to happen via clear-cutting in the westshore. Stop encouraging car dependency. Do the right thing, pass this initiative.

## Grant Diamond

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**From:** Janet Simpson [REDACTED] >  
**Sent:** August 4, 2022 8:51 AM  
**To:** Public Hearings  
**Subject:** Missing Middle

This strategy is a house of cards, based upon lies.

One lie is that a liveable city is not dependent upon parks, green space, mature trees, adequate hospitals and clinics, a consistent water supply, libraries, and community amenities, and that the population can be constantly increased without providing more of these.

Another lie is that densification in Victoria will have any mitigating effect upon urban sprawl in other communities.

It is also a lie that incentivizing the replacement of existing rentals (which accommodate 70% of our residents) with unaffordable owned builds will somehow improve the housing situation.

It is a lie that 10% below market price is in any way affordable.

It is a lie that a department called "Development Services" is as visionary and removed from influence by self-serving groups such as the UDI to draw up the blueprint for anything as important as a housing strategy.

It is a lie that blanket up zoning will result in increased affordability.

It is a lie that blanket up zoning will result in a Reaganomic-style trickle-down or filter down of affordable housing.

It is a lie that the inevitable loss of thousands of our mature trees (which are on private land) will result in a magical increase in the tree canopy.

It is a lie that inviting housing speculators and investors through blanket up zoning is desired by local residents.

It is a lie that zoning is racist by definition. If that were true, Vancouver would be all white.

And it is a lie that eliminating the public's right to participate in decisions which directly affect their immediate neighbourhoods is in agreement with the City's commitment to the IAP2.

The blanket up zoning of Victoria must not pass. We need leadership from our City council, not lies.

Janet Simpson  
1336 Richardson Street  
[REDACTED]

[REDACTED]

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**From:** Jim Turk <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 10:26 AM  
**To:** Public Hearings  
**Subject:** MMHI

Dear Mayor and City Council

I am opposed to this Initiative in its present form.

This initiative should not be approved by this sitting council.

I believe that a few neighborhoods of Fairfield and James Bay will be unfairly targeted.

Very few people will be able to afford these "affordable homes" which would most likely sell for \$900k+. (TH's)

There will profound negative consequences for those evicted by renoeviction.

Thank you

Jim Turk

Sent from my iPhone

[REDACTED]

**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 11:17 AM  
**To:** Public Hearings  
**Subject:** Fw: This letter to Mayor and Council is too good not to share.

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**From:** JC Scott <[REDACTED]>  
**Sent:** August 4, 2022 11:02 AM  
**To:** David Helm <[REDACTED]>  
**Cc:** Lisa Helps (Mayor) <LHelps@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>  
**Subject:** RE: This letter to Mayor and Council is too good not to share.

Lisa & Marianne,  
I totally agree with David and wonder what hubris has engendered this legacy without responsibility initiative?

I remember when I believed in both of you because your intentions were citizen oriented.  
Look in the mirror please, then pause and let Victoria decide what Victoria wants.  
JC

**JC Scott,**  
Principal Designer



291 Kerwood Street  
Victoria, BC, V9B 1A2  
[REDACTED]  
[REDACTED]  
<http://www.jcscott.com>



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**From:** David Helm <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 10:55 AM  
**Subject:** This letter to Mayor and Council is too good not to share.

Dear Mayor and Council

As you would be well aware, pursuant to section 115(a) of the *Community Charter*, the primary responsibility of municipal councillors is “to consider the well-being and interests of the municipality and its community”. And, per section 116(2) “In addition to the mayor’s responsibilities as a member of council, the mayor has the following responsibilities: (a) to provide leadership to the council, including by recommending bylaws, resolutions and other measures that, in the mayor's opinion, may assist the peace, order and good government of the municipality”.

In this context “A municipality is a corporation of the residents of its area” (see 6(1) of the *Community Charter*). In other words, **ALL** residents. Not just those who find housing to their liking unaffordable in Victoria. (Incidentally and obviously, this issue exists in every city in the world and always will.)

The “missing middle initiative” now before the mayor and council is not “in the interests of the municipality and its community.” It is only designed to benefit a small minority, and to entirely remove public consultation prior to approval of development in many instances. And, what is still more galling is that it isn’t even clear if even the objective of providing more affordable housing stock could actually be achieved by it, and if so, to what tangible extent, if any. This whole initiative is based only on speculation. Further, as was so blatantly illustrated by the City’s responses to the many questions posed by Susan Simmons in her July 11, 2022 email to you, you haven’t bothered to even consider the potential adverse impacts of it on a myriad of other matters critical to the livability, safety, health and economic viability of our capital city. That is bad governance in the extreme.

This initiative, if proceeded with, would totally change the whole of Victoria forever, in primarily negative or entirely unforeseeable ways. It is unconscionable for a mayor and any councillor who is not seeking re-election and the other members of council who may very well be looking for other jobs in ten weeks, to pass such drastic measures now. If the next mayor and council still feel that this should be advanced, then leave that to them to pursue after more careful thought and public input.

Regards,



[REDACTED]

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**From:** Kathryn Foster <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:59 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Public Hearing, August 4th

August 4, 2022

Dear Mayor and Council,

I have been a resident in the North Jubilee neighbourhood for nearly 35 years. Those are my credentials to comment. I am also the parent of 2 children in their 30's and landlord to a couple in their 30's, so I have digested the Missing Middle Initiative with interest and some misgivings. The generational divide weighs heavily on my response – as does many years of witnessing even the best plans by neighbourhoods and the City to falter or fail for lack of follow up or adherence.

I could say much but I will limit my comments to these:

-One size doe NOT fit all. Therefore, I think making a plan that targets the majority of properties in Traditional neighbourhoods without acknowledging in some fashion, the specific pressures, needs and influences on that neighbourhood will do the opposite of building community. Notably, Jubilee is the ONLY neighbourhood in Victoria that includes or borders a tertiary hospital site: Royal Jubilee Hospital. The hospital will not be going away; its influence dominates and will continue to dominate our neighbourhoods and especially North Jubilee which share the longest border and arguably the most traffic, parking issues and erosion of green space as a result. To add more density without acknowledging the uniqueness of the of the pressures the hospital exerts is flawed thinking.

-I read that the target number of units for the Missing Middle effort is 1000 but it does not say how the 1000 will be distributed. I think that you need instruct staff that a count must be kept of how many applications are put forward for each neighbourhood to ensure that there is an even distribution of added units. Without such an instruction of oversight by Council, I can almost guarantee certain neighbourhoods, like North Jubilee, will undoubtedly bear the brunt of the increase in density and that is a fairness issue.

-If I build a fence on my property lines even within all the legal and bylaw recommendations, it is still the moral and ethical recommendation of the nature of community for me to inform my neighbour. I see nothing in the documentation that indicates neighbours of properties being considered for missing middle approval will be informed. Not doing so is NOT community minded, moral, or ethical. Its just RUDE. A notification does not mean the process stops but neighbouring properties should be made aware if a missing middle proposal has been put forward.

So, what I propose, considering the above points, is that you amend the plan to include an 'application of exception' clause, whereby a neighbour or neighbourhood would have a prescribed limited amount of time to apply for an exception. Because there should always be a way to consider the situations where one size does not fit or is not suitable. I am not suggesting a long frame but to give a new build the chance to be, and the ultimate new resident to feel welcomed to the community rather than forced upon it.

Sincerely,  
Kathrynn Foster

[REDACTED]

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**From:** Kirk Buhne <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 11:10 AM  
**To:** Public Hearings  
**Subject:** Opposition to Missing Middle Zoning Changes

I strongly oppose the zoning changes that would allow six units per lot at higher densities. I believe this will not solve the housing crisis but rather draw more people from off of the island to live in Victoria in denser neighbourhoods, displacing families and long term Victoria residents, residents who have been in their neighbourhoods for generations.

I believe this will lead to a greater density of renters versus owners, investor owners vs. owner occupiers. This will lead to a greater transient population that is little concerned for neighbourhoods and cities. This will ruin neighbourhoods like James Bay and Fairfield. Fewer engaged citizens will lead to more crime. Sidewalks will become less child and family friendly. Crime is a growing issue in Victoria.

Historic neighbourhoods should be preserved as should green space and trees. This will destroy urban tree cover. Such development may even lead to more deaths within the city as we experience more heat waves. Such development will preclude people from growing their own food in their own backyards. Backyard gardens were the original reason for the type of neighbourhood zoning we currently have. By increasing density, losing sun, we will inevitably exacerbate future food shortages, which are likely coming. Victoria already has the highest priced food in Canada. Over height buildings will shade neighbouring homes from the sun and prevent us from installing efficient solar panels on our roofs or walls. This will preclude future vertical vegetable gardens. We even need light for our mental health, yet such developments will deprive us of sun. Dark cities are known to have higher suicide rates, which peak here in winter months.

The developers should rather build to six stories in the downtown core than ruin existing well functioning neighbourhoods. I live in a neighbourhood of houses over 100 years old and many accommodate multigenerational families as well as secondary suites for a diverse population. Some families co-house, sharing houses. This neighbourhood works but it won't if the missing middle initiative passes. We will be left with an ugly density, and full of transient newcomers who care not for the long term health of our city.

Missing middle zoning changes to James Bay and Fairfield are entirely misguided. If you as a Councillor think you know better you are misguided and using an elitist perspective. Listen to your citizens. This is our city, not just yours. Represent your citizens, your neighbourhoods. We understand the issues as well.

Kirk Buhne  
140 Medana St.  
James Bay  
Victoria  
--  
Kirk Buhne  
[REDACTED]

[REDACTED]

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**From:** Kathleen De Vere <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 10:32 AM  
**To:** Public Hearings  
**Subject:** August 4th Council meeting: missing middle

Hello Victoria city council.

Like dozens of other people before me, I'm writing about the Missing Middle Housing Initiative, and how important I think it is. Due to the volume of correspondence you have no doubt received, I will keep this extremely brief.

I am a young professional, as is my husband. According to the most recent census our combined income is well above the median household income in Victoria\*. Last summer we set out to buy a larger home to accommodate our growing family. However, even with already owning our own condo, excellent credit, and no debt aside from our mortgage, we were unable to find anything in our price range, because having a child is expensive. The few townhouses and duplexes for sale were snapped up before we could even look at them to make an offer. We moved to Saanich, as the only housing options in Victoria were condos, or single family homes going for well over a million dollars (at the time). I understand few people wish to live in seas of ten story apartments, but what is wrong with townhouses and rowhouses? How can they be so damaging to the character of our neighbourhoods, but be picturesque, desirable places to live in cities like London, New York, or Melbourne?

Why should only the wealthy have access to outdoor space and trees? The current lack of housing options is pushing out young people and young families.

Regards  
Kathleen De Vere

\* Source:  
<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=9810005801&pickMembers%5B0%5D=1.5917&pickMembers%5B1%5D=2.1>

[REDACTED]

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**From:** [REDACTED]  
**Sent:** August 4, 2022 9:03 AM  
**To:** Public Hearings  
**Subject:** Writing in support of missing middle

Please approve the missing middle housing initiative — you all know the housing issues we are facing as a city, and having SFH as the default isn't working.

Please pass this initiative and continue working towards other policies to make housing a reality.

And let's keep focusing on affordable subsidized housing in addition to this!

Sincerely, a resident who is excited to see new homes and welcome new neighbours.

[REDACTED]

(Due to ongoing harrassment and stalking, please redact my name and address from the public record. Thanks so much!)

[REDACTED]

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**From:** Kevin G [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:47 PM  
**To:** Public Hearings  
**Subject:** Missing middle housing initiative

Hello, I'm a Victoria resident and voter. I support the missing middle housing initiative and I would like to see you guys at city hall do everything you can to bring about a far more accessible, affordable and equitable housing market.

I mean, in lieu of totally decommodifying housing of course, but I appreciate that the scope of your influence at city hall does not necessarily extend far enough to implement that type of change at higher government levels.

Sincerely yours,

Kevin Gontovnick

P.S. can council member Stephen Andrew please drop out of the mayoral election? We can do a lot better than him & he stands a pretty realistic chance of winning. Thanks! Sorry Stephen.

[REDACTED]

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**From:** Kendall Hammond <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 10:36 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative

Hello,

I am writing this message to express my support for the Missing Middle Housing Initiative currently being debated by Victoria City Council. I am a resident of the Harris Green neighbourhood and have been renting my current space for more than six years. I strongly believe that this initiative will help the City meet its climate commitments and will also be a crucial policy as a part of the comprehensive approach that is required to addressing the housing shortage crisis in our community.

All the best,  
Kendall

[REDACTED]

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**From:** Kelsea Hughes [REDACTED]  
**Sent:** August 4, 2022 7:16 AM  
**To:** Public Hearings  
**Subject:** Missing Middle

To Victoria City Council,

I am writing to voice my support of the missing middle initiative. The city is facing a housing crisis and every little step can help. While I don't think the MMHI as it is proposed goes far enough in allowing additional housing forms in enough places, it is certainly a better option than the status quo that has contributed to our housing crisis. Council should vote in favour of the Missing Middle Housing Initiative now!

Sincerely,  
Kelsea Hughes, North Park

[REDACTED]

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**From:** Kiera Louis [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:12 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

Good afternoon,

My name is Kiera Louis, I live at 6255 Springlea Rd, Victoria, BC V8Z 5Z5. I am writing to you in support of the missing middle housing initiative.

I believe this would be a beneficial move for our society and the current housing crisis.

Please vote to pass the zoning amendment.

Thank you,

Kiera



[REDACTED]

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**From:** Kirsten Pizarro <[REDACTED]>  
**Sent:** August 4, 2022 8:50 AM  
**To:** Public Hearings  
**Subject:** Written Comment: Missing Middle Public Hearing - August 4th at 6:30 pm

Hello,

I would like to submit comments to the public hearing on the Missing Middle housing initiative.

I do not support the initiative as it currently stands.

I'm concerned that:

- Residents of neighbouring properties will not be engaged or consulted on plans for new developments.
- The height/width/depth of new developments will be too imposing on residential streets and not fit in with the character of neighbourhoods.
- Green space will be eroded as new developments will use up most of a property's space.
- Neighbouring properties of new developments will lose privacy and natural light if large developments are built beside them.

If smaller multiplex developments can be built after engaging with neighbours and having different rezoning rules taking the above into consideration then I may be able to support a missing middle housing initiative.

Thank you,

Kirsten Pizarro  
962 Bank Street

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[REDACTED]

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**From:** Karen [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:38 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Public Hearing Letter

Agenda Item: Missing Middle  
Name: Karen Reynolds  
Address: 1107 Summit Ave.

Dear Victoria City Council and Mayor,

I am writing to express my strong opposition to the Missing Middle Zoning Initiative for the following reasons:

- 1) An increase in zoning from 1 single family dwelling to 6-12 dwellings and an increase in allowable heights is one of the most important policies to face our city and is too large of a change to be passed so quickly by the City. It is completely unacceptable that families might have a future of discovering that 6-12 units are being built next to their home or in their neighborhood without being consulted or knowing that plans were made. These are extremely stressful conditions that the City is proposing that the current citizens will have to live with. These decisions need to stay a council decision and are not something that should be decided upon by City employees and Developers.
- 2) This decision gives developers (that may not live in our neighborhoods) too much control over changing the current landscape for the intent of making a profit. Development impacts need to be discussed and planned with community members to ensure changes create a positive impact for existing residents.
- 3) I do not believe that this form of densification of residential areas will address the housing needs of today and in the future.
- 4) Parking is going to be an issue. The City has plans for people to bike, however many people including many aging seniors do not own a bike, want to bike or are able to bike.
- 5) There was inadequate engagement from the people in the affected neighborhoods. There were also meetings held by the City of Victoria when residents were on holidays or at work and could not attend. As a result, there is still a lack of public understanding of this policy.
- 6) There is no protection for existing renters.

I strongly believe that:

- This policy change requires more research on the impact of property taxes and the impact on current property owners and renters.
- Current homeowners should be consulted and informed when a development this large is being considered in their neighborhood.
- This proposal should not be approved, and all new zoning policy changes should be determined in the future when the upcoming Council Members and Mayor have been elected.

Thank you.

Karen Reynolds

[REDACTED]

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**From:** Jay Zakaluzny [REDACTED]  
**Sent:** August 4, 2022 1:01 AM  
**To:** Public Hearings  
**Subject:** MMI comments

I am a home owner in Fairfield. I SUPPORT this Initiative. It gives me hope that my daughter and her peers may have housing choices in this city in the future. The Middle Missing initiative, imperfect as it may be, is a great step forward. I chose infill density over the current impacts of a chronic housing shortage.

Jay

[REDACTED]

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**From:** Liz Hoar [REDACTED]  
**Sent:** Thursday, August 4, 2022 11:49 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Public Hearing Comments

To Mayor and Council

I am against this bylaw being passed at this time. I think there has not been adequate discussion with neighbourhood association and residents. I consider myself fairly well informed about neighbourhood issue and I only became aware of the proposed by-law when a brochure came from the City in late June.

The timing of this public hearing in mid-summer, when many residents are taking well-deserved vacations after 2+ years of Covid when there was no public in-person consultation except the one July meeting. Has there been any reaching out to neighbourhood associations to discuss this topic? I'm not aware of anything in South Jubilee. We are mere months away from an election where many of the current council have indicated they will not or may not be running. This is such an important proposal that will affect all residents in all neighbourhoods, that it should be left for debate as part of the upcoming election and with a new council to decide.

Here are a few of my questions:

- How does this not make all residential property in Victoria more expensive? Thus pricing out people wanting to buy a house?
- None of these new builds will be affordable in any way. Even the planner I talked to at the July open house admitted there is not aimed to make housing affordable.
- These new builds will often replace housing that is older and affordable, housing that now accommodates families who can actually afford the rent. Where do these displaced renters go?
- How does this not become another developer/investor bonanza? As we see Reits and investment groups swallowing up apartments. Why will they not turn to this kind of proposal as well.
- How many lots can be amassed into one project without any kind of rezoning or neighbourhood consultation?
- What kind of consultation with neighbours will happen?

Liz Hoar

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 11:05 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Housing Public Hearing Feedback

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**From:** L H <[REDACTED]>  
**Sent:** August 4, 2022 10:26 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Missing Middle Housing Public Hearing Feedback

Attention City Council,

I am writing to express my concern over the Missing Middle Housing proposal that is going to public hearing tonight.

I urge council to hold off passing this initiative. It is a major change in policy that should be debated during the civic election in a couple of months. A new council should decide whether it goes forward or not.

I feel there are better options that would come forward during an election.

Lara Hurrell  
Home owner in Victoria

[REDACTED]

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**From:** Lynne Rogers [REDACTED]  
**Sent:** August 4, 2022 8:22 AM  
**To:** Public Hearings  
**Subject:** Missing middle housing please vote NO

I live in the area surrounding the jubilee hospital and feel very strongly that this NOT be pushed through by city council. Please look at the development at Adanac and Richmond. This does not fit tge character of the neighbour hood as promised and is much to high for a residential area. I know of many houses that have already been mass bought by developers here and I am very worried about losing the quiet nature of the streets. Please put a pause in this BLANKET SOLUTION for affordable housing because you know it won't be.

Lynne Rogers

Sent from my iPhone

[REDACTED]

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**From:** Laura West <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 9:52 AM  
**To:** Public Hearings  
**Subject:** Support for missing middle policy

Yes to the policy!!

I live in Vic West and fully support the Missing Middle policy. We need more options for housing and this is a small step in the right direction that should have been implemented years ago.

10-864 Central Spur Rd  
Victoria BC  
Laura West



[REDACTED]

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**From:** Michaela Bayley <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:09 PM  
**To:** Public Hearings  
**Subject:** In Support of Missing Middle Housing

To Victoria's City Council,

We are in a housing crisis. I have been told to move out of this city if I cannot afford it. I'm a young professional working in the public sector with my partner who also works for the government. As inflation rises, I'm looking at the percentage my rent will go up.

But there is no where else to go. Wages are not keeping up with inflation. Housing is a crisis across this country. But when I see push back from creating affordable housing for those wanting to stay and make Victoria their home, it's defeating.

**I am in support of missing middle housing.**

Please, continue to develop this plan and legislation to include creating AFFORDABLE densification. We have another missing middle: the middle class.

When a town house in Happy Valley starts at 700k with a \$250 strata fee for the duration of your 25 year mortgage?? How is this affordable. You cannot simply escape this.

More people will continue to join the massive amounts of people displaced and unhoused. This needs to be done.

Thank you.

Michaela B.

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 1:58 PM  
**To:** Public Hearings  
**Subject:** Fw: Submission - Public Hearing - Missing Middle Housing  
**Attachments:** Public hearing - Missing Middle Housing WORD.docx

---

**From:** Mariann Burka [REDACTED]  
**Sent:** August 4, 2022 1:41 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Submission - Public Hearing - Missing Middle Housing

Please accept the following as my submission to the public hearing tonight.

Note: I am also attaching a WORD version of this below in case it is easier to read than the e-mail version.

Dear Mayor and Council:

My name is Mariann Burka. I am a resident and co-owner of a single detached home on Niagara Street. James Bay and the City of Victoria has been my home and my community for the last 32 years.

I am providing this submission to City Council at this public hearing to express my deep concerns and alarm at the timing and content of these proposed changes for the following reasons:

**Timing and Mandate:**

These proposed changes are one of the most important land use policies to face our city. It is inappropriate and morally wrong for an outgoing Council that is at the very end of its elected mandate to be voting on a significant issue like this and imposing its will on the people of Victoria.

We are two months from an election. Many of the Councillors who will be voting on this are not even running for re-election and, as such, will not even be accountable for the decision they make and the lasting impact they will leave on our city and our communities. An issue this crucial with such important long-term impact on our city and our communities, should be an election issue and not rammed through in the last minutes of a dying Council's mandate. It is like a hit and run where the driver does the damage and leaves the scene to avoid facing the consequences.

I appeal to Councillors to check their moral compasses and demonstrate their responsibility and accountability by refusing to vote on this issue at this time.

**Transparency and Accountability:**

These proposed changes are an attack on a very fundamental right of residents to know what is happening in their communities, to have a say in matters that affect their communities and to hold their elected officials accountable for decisions that affect the quality of their lives. These proposed changes remove all of that.

MMHI approvals will be made by city staff for the clear purpose of “getting Council and the public out of the way”. Staff who will be authorized to make crucial decisions are not elected officials. They have no accountability to the residents whose communities and quality of life will be impacted by the decisions they make. This is contrary to the very fundamental principles of a democratically elected government.

I appeal to Councillors to demonstrate their duty and responsibility by voting against these changes and leaving crucial housing decisions in the hands of elected officials where they belong.

### **Consultation:**

Community consultation and the right of residents to have their say is fundamental to a free and democratic society. That principle is at risk with these proposed changes.

Over the years, Council has demonstrated an increasing lack of respect for community input. Council regularly receives and ignores community concerns in neighbourhood association reports about specific developments and initiatives if the concerns do not support their goals. They routinely override neighbourhood plans and the Official Community Plan. They even ignore existing bylaws (e.g. to protect trees or minimum parking spaces) if it furthers their purposes. Council decisions are made even in the face of overwhelming opposition. A recent example in my own community in James Bay was the approval to demolish 45 units of low income housing at Village Green and replace it with 137 units of market priced housing. This approval was granted in the face of nearly 90% of all the written and oral submissions at the public hearing being opposed.

But it is one thing to ignore community input and another to eliminate it altogether. With these proposed changes, Council has taken the most extreme step of all to ignore and override the community. These proposed changes, if approved, actually **eliminate** the right of residents to be heard at all.

I appeal to Councillors to demonstrate their respect for communities and for the democratic principles of consultation by voting against these proposed changes.

### **Impact of Densification:**

City Council is committed to density intensification seemingly at all costs. I understand that Victoria’s grand total of single family residences currently number a mere 13, 831. Of these, 11,162 are eligible for the proposed missing middle regulations. This renders single family residences in Victoria a threatened and dying species.

The MMHI proposed regulation is in addition to other initiatives already under way that threaten “Traditional Residential Housing”. In my own community of James Bay, which is already the densest community in Victoria, proposed changes to the *Official Community Plan* intend to transform it to 90% multiple units and to increase height and density to 6 stories and beyond. The MMHI proposal will increase this further. There are already at least 30 development proposals in our neighbourhood at this time. Each new development approved is used as precedent for ever more buildings which are ever higher and ever denser. These proposed changes will make it “open season” for developers and change the very character of our city and our communities, not to mention the impact on industries that depend on that character. I doubt that tourists will flock to see the proliferation of high density towers.

Recent requests for information have revealed that the city is imposing these changes without a clear identification or understanding of the precise needs for housing or the impacts of increased densification on our communities.. The city does not know and cannot identify how many single family dwellings are already multi-family dwellings. It does not know and cannot identify the impact on availability of land for affordable housing. We have seen already in my own community of James Bay how density intensification is replacing existing low income and affordable housing with market priced housing and displacing low income families who were long-time residents of the community. The city does not know and has not determined what protections would be available for people displaced through MMHI initiatives. Nor does it know the impact of new builds on schools, community organizations and services to meet additional need. Nor does it know the impact on property values overall.

Densification requires a careful, considered incremental approach that respects the character and needs of communities. It also needs a more collaborative approach between communities and municipalities to ensure a more integrated housing strategy that spreads development more equitably across the region.

I appeal to Councillors to reject the proposed changes and go back to the drawing board to identify more clearly the need and impact and to create a more incremental, integrated and collaborative housing strategy that better balances density needs with respect for the history and character of our communities.

### **Impact on Trees and Greenspace:**

Mature trees are essential to our ecosystem, the health of our planet and the physical and emotional well-being of residents. To combat climate change, our urban tree canopy needs to be maintained and increased. These MMHI proposals provide no protection for our city's urban forest canopy and make an already bad situation worse.

Our city is already routinely approving the removal of mature trees and decreasing our urban tree canopy for development and city "improvements" like bike lanes, traffic calming or sidewalk expansion. Tree protection bylaws are already woefully inadequate in protecting mature trees. Council routinely allows the removal of bylaw protected mature trees if they are within the building envelope and there is no requirement for developers to show that alternatives to removal have been considered or to prove that tree removal is a necessity.

Even after developers have given public assurances to preserve trees, the city allows their removal simply to make it easier for construction vehicles to access the property. ("Disease" is used as the ubiquitous reason with no evidence required.) Planting young saplings is not an equivalent substitute. It can take 200 to 300 saplings to replace the benefits of a single mature tree. Replacement trees are often different species, inconsistent with the character of the neighbourhood.

There is also a very alarming trend in Victoria where the goal of density intensification allows developers to maximize footprints (and profits) by reducing setbacks to the point of virtually eliminating them. Such new developments do not fit in with existing streetscapes and are changing the character of the community. Blockage of sunlight to the street and neighbouring properties are turning our neighbourhood into dark concrete jungles. The proposed MMHI changes provide no protection against such destruction of green spaces and no requirement to compensate for such losses to the community.

I appeal to Councillors to reject the proposed changes as detrimental to the protection and preservation of mature trees, the maintenance of our urban tree canopy and the overall contribution of green spaces to our communities.

### **Impact of Available On-Street Parking:**

These proposed changes exacerbate what is already a serious parking crisis in our city and in our communities. While I support incentives to increase use of pedestrian, bicycle and public forms of transportation, the city's reduction of available on-street parking is not a solution and has created a crisis in our city.

City Council routinely approves new developments that are well below bylaw requirements for parking spaces based on the number of units. This places a burden on existing residents who must compete with new residents for ever scarcer on-street parking. The situation is exacerbated by city "improvements" (like traffic calming barriers, bike lanes and sidewalk expansions) that further reduce available on-street parking. Shortage of parking downtown is also spilling over into adjacent communities like James Bay for workers and shoppers who cannot find parking spaces downtown.

While we all support reducing car emissions and vehicle use, the fact remains that most people (even those who walk, use bicycles and public transit) still own and will continue to own vehicles in the future (albeit fuelled with alternate sources of energy). There will continue to be a need for vehicles in large cities and for parking spaces to hold them.

I appeal to Councillors to reject the proposed changes as failing to address and exacerbating parking problems in our city.

**Conclusion:**

I submit these comments and recommendations with respect and concern for the future of the city and community that I know and love. Please demonstrate your respect and concern in return and your responsibility to the position you hold especially in this stage of your mandate, with only two months to go before our municipal election.

Thank you. Sincerely,  
Mariann Burka

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:44 AM  
**To:** Public Hearings  
**Subject:** FW: MMHI  
**Attachments:** IMG\_5522.jpeg; IMG\_5521.jpeg; IMG\_5518.jpeg; IMG\_5520.jpeg

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**From:** Moral Constitution <[REDACTED]>  
**Sent:** August 4, 2022 6:35 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** MMHI

Mayor/ Council,

Thank you for giving us the chance to weigh in on MMHI in Victoria. I work in town here as a Paramedic, I love the city. I am not strongly opposed to MMHI as a component of dealing with the housing crises but am lost as to why so much is being placed on a hundred houses per year ranging between 800,000 and 1.2 million dollars while displacing renters is so high on the agenda?

A few questions for you,

In speaking with developers and quoting 1.2 million dollars, the developers constantly put up a graph stating they don't know why people think the units will cost over 1 million dollars.

Do we have a guarantee they will be 800,000? If not can they guarantee that 50 percent of them can be 800,000? 20 percent?

Are there any safeties in place that will stop investors from grabbing up these new properties?  
I ask because investment properties in victoria are at the heart of this housing crises.

The CRD has 3161 full homes or Condos that are rented out as short term rentals.

Victoria has 1073 full homes of condos being used. This has gone unchecked in this City and if you think a hundred houses a year at 800,000 - 1.2 million is a difference maker. Imagine if 1073 short term rentals All at Once Became long term rentals or homes for sale. Or 3100 in the CRD.

There is precedence for this, city council in London Ontario passed a bill not allowing airbnbs unless they are a part of your primary residence and you must be home while guests stay over. New York, Santa Monica, and a long list of other cities do the same Thing.

Some cities require you to be zoned commercially to use Airbnb and you must pay a hotel tax. I bring this up because if this goes unchecked and investors buy up these new MMHI how will this solve anything?

Mortgages alone for these new units will be between 3600 and 5000 a month plus a strata fee. This is elitist, how does this help you keep service sector and people like myself who work as first responders here in the city?

Here is a link to a news story about city council's air bnb decision in London.

<https://globalnews.ca/news/8920952/council-approves-london-ont-airbnb-bylaw/amp/>

NY- Ij\$li\$Emfrf\$w\$rk\$w\$jsv\$e\$ssq \$r\$e\$lsq i\$lex\$ti\$iv\$erirx\$iw\$hirxw\$vi\$er\$mk\$w\$aw\$ike\$P\$y\$nj\$li\$  
ti\$iv\$erirx\$iw\$hirxw\$vi\$er\$hm\$rk\$dl\$in\$ir\$wi\$te\$gi\$ss\$er\$Emfrf\$irx\$iv\$jsv\$iw\$der\$74\$he\$w\$aw\$csx2

Without assurance that new home sales are not going to primary residencies than we are just adding more short term rentals.

41 percent of BC homes are owned by 3+ home owners and or Corporations. Here is the source for that information. Without any restrictions are you not just making the problem worse?

Source:

<https://www.bnnbloomberg.ca/multiple-property-holders-own-up-to-41-of-housing-in-some-provinces-statscan-1.1751263.amp.html>

Also 81/86 MLAs have a second property already which in compounding the crises. Can you be the bold council that takes a step forward and deals with all short term rentals?

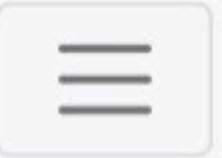
Hopefully if MMHI passes we could add some of these restrictions of price and ownership to the language.

I also hope I put the short term rentals on your radar as major factor.

Thank you for your time, included as attachments are the data for airbnbs and what mortgage costs would be for the MMHI units.

Sean D  
350 Douglas Rd

Ps - please repair Bay Street, it's awful taking patients with injuries down that street to the hospital.



## Victoria

Filter by:

Victoria | ▾

# 1,073

out of 3,713 listings (28.9%)

## Room Type

Only entire homes/apartments

Airbnb hosts can list entire homes/apartments, private, shared rooms, and more recently hotel rooms.

Depending on the room type and activity, a residential airbnb listing could be more like a hotel, disruptive for neighbours, taking away housing, and illegal.



# 100.0%

entire homes/apartments

# 1,073 (100.0%)

entire home/apartments

# 0 (0%)

private rooms

# 0 (0%)

shared rooms

# 0 (0%)

hotel rooms

## Activity

Only recent and frequently booked

The minimum stay, price and number of reviews have been used to estimate the the number of **nights booked** and the **income** for each listing, for the last 12 months.

# 127

average nights booked

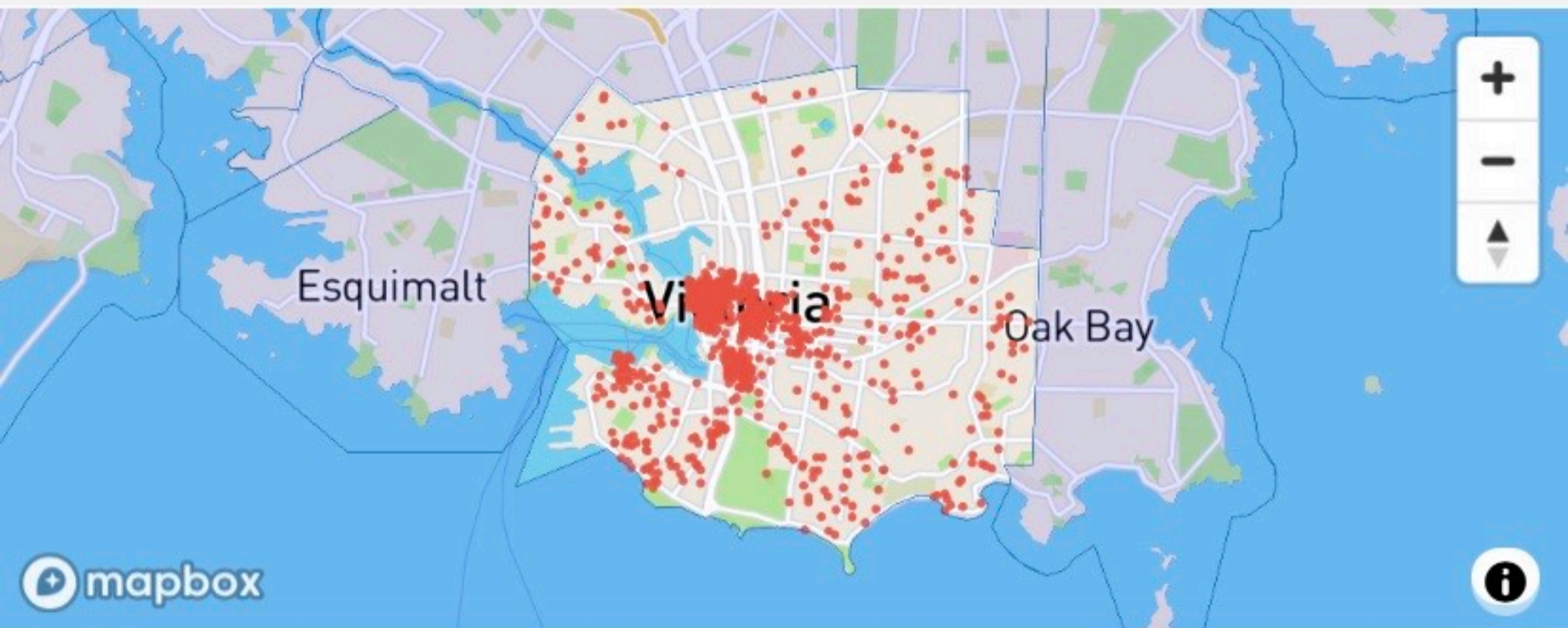
Is the home, apartment or room rented frequently and displacing units of housing and residents? Does the income from Airbnb incentivise short-term rentals vs long-term housing?

# CA\$215

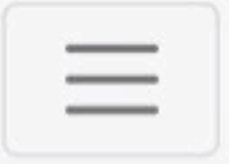
price/night

# CA\$25,288

average income







## Victoria

Filter by:

Victoria | ▾

**3,161**  
out of 3,713 listings (85.1%)

## Room Type

Only entire homes/apartments

Airbnb hosts can list entire homes/apartments, private, shared rooms, and more recently hotel rooms.

Depending on the room type and activity, a residential airbnb listing could be more like a hotel, disruptive for neighbours, taking away housing, and illegal.



**100.0%**  
entire homes/apartments

**3,161 (100.0%)**  
entire home/apartments

**0 (0%)**  
private rooms

**0 (0%)**  
shared rooms

**0 (0%)**  
hotel rooms

## Activity

Only recent and frequently booked

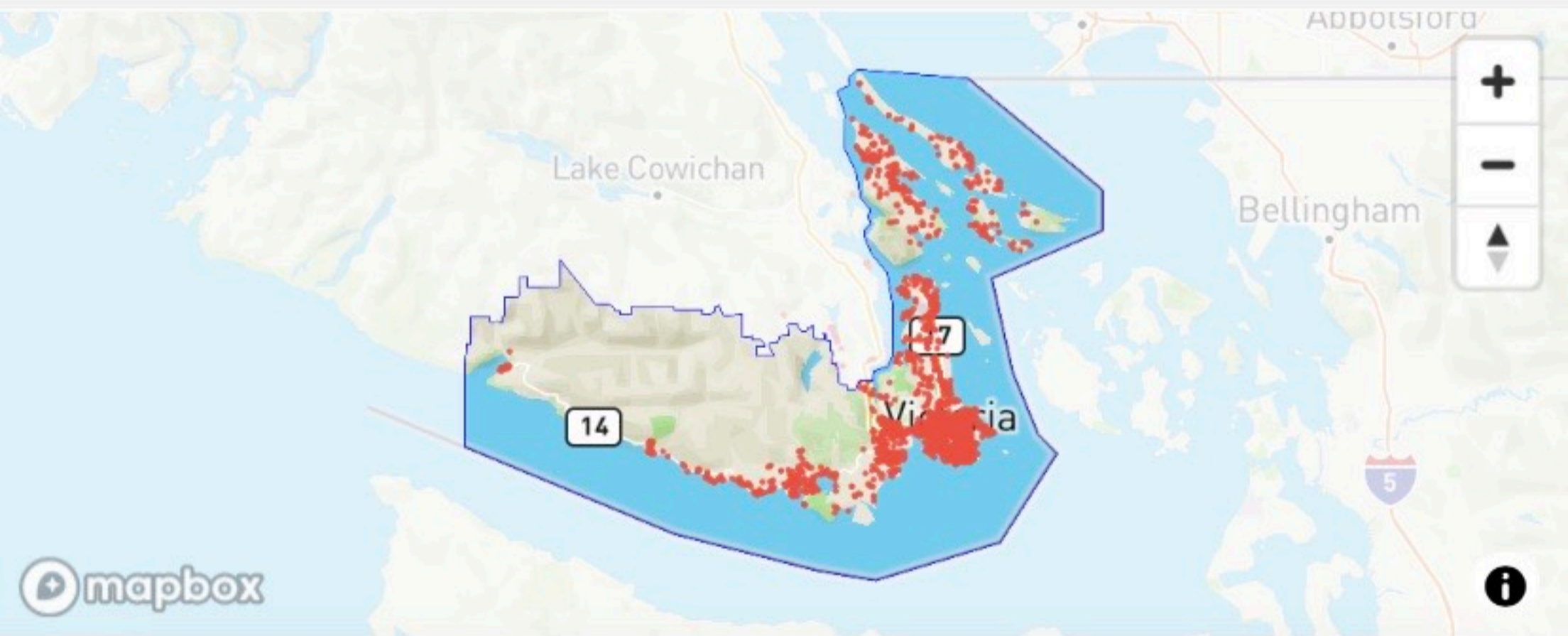
The minimum stay, price and number of reviews have been used to estimate the the number of **nights booked** and the **income** for each listing, for the last 12 months.

**110**  
average nights booked

Is the home, apartment or room rented frequently and displacing units of housing and residents? Does the income from Airbnb incentivise short-term rentals vs long-term housing?

**CA\$233**  
price/night

**CA\$22,868**  
average income



ESTIMATED PAYMENTS

# \$3,515

Weekly

Bi-weekly

Semi-monthly

Monthly

Purchase Price  
**\$850,000**

Mortgage Amount  
**\$680,000**

Down Payment

**\$170,000 • 20%**



Amort.

**25 Years**



Interest Rate

**3.8 %**



REW.MONEY

## It's never too early or too late to talk about your mortgage options.

And there is no such thing as a silly question. Start a conversation with your REW.money Advisor today and we will figure out the whole *money* thing, together.

**LET'S TALK**

MESSAGE

**I'D LOVE TO BOOK A TOUR**

ESTIMATED PAYMENTS

# \$4,962

Weekly

Bi-weekly

Semi-monthly

Monthly

Purchase Price  
**\$1,200,000**

Mortgage Amount  
**\$960,000**

Down Payment

**\$240,000 • 20%**



Amort.

**25 Years**



Interest Rate

**3.8 %**



REW.MONEY

## It's never too early or too late to talk about your mortgage options.

And there is no such thing as a silly question. Start a conversation with your REW.money Advisor today and we will figure out the whole *money* thing, together.

MESSAGE

I'D LOVE TO BOOK A TOUR

[REDACTED]

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**From:** Marco Costa [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:47 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative

Hello Victoria City Council,

As a resident of Oaklands, bordering Fernwood, my home block's zoning will be affected by the Missing Middle Housing Initiative.

**I strongly support this initiative in its current state.**

Having higher density is sorely needed in Victoria.

As a owner of a single family home, I endorse the increase in density, despite any possible downsides such increase can have to my neighborhood: having more homes for people to live in Victoria trumps any sort of minor inconveniences I could face myself.

The low density I experience in my neighbourhood actually causes incoviencines: short supply of commercial business at walkable distance, infrequent bus routes. I'd like to see increased density to allow for the residents of our city to be able to walk or bike to where they need to go, and have frequent public transit routes to match the increased population density.

Thank you so much for tackling the missing middle housing problem!

--

Marco Costa

- 2530 Victor St, V8R4C9

[REDACTED]

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**From:** Mary Heeg <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 1:00 PM  
**To:** Public Hearings  
**Subject:** Support for Missing Middle Housing Initiative

Good afternoon,

I am emailing to express my strong support for the Missing Middle Housing Initiative. I moved to Victoria five years ago to attend university and have experienced first hand the city's competitive and expensive rental market.

As a recent graduate, I'd love to stay in Victoria long term. However, I doubt I'll be able to afford to buy here, and even the rental market is becoming increasingly untenable. Passing the Missing Middle initiative will increase the city's housing supply and diversify the types of housing available, making it easier for young professionals like me to stay in the city.

Densifying housing supports so many issues that my peers and I care about: increased housing supply, affordability, and climate mitigation through creating walkable communities.

I strongly urge all members of council to vote in favour of this initiative.

Thank you,

Mary Heeg  
1487 Stroud Road  
Victoria BC  
V8T 2K7

[REDACTED]

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**From:** Meghan Lambeth <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 11:35 AM  
**To:** Public Hearings  
**Subject:** missing middle housing

Good Day,

I would like to express my concern regarding the lack of protection of trees on private property. I believe approximately ¾ of the municipality of Victoria trees canopy cover is located on private land. It is critical these trees are protected (especially older and/or significant trees) or replaced due to the following reasons:

- Trees help with energy savings by protecting homes from strong winter winds and summer heat reducing heating/cooling costs by around 25%.
- Tree help to clean air, improve water conservation, and store carbon
- Trees are beautiful and play a big role in making Victoria such a lovely city
- Tree harbour wildlife and improve the land's capacity to adapt to climate change.

The potential for missing middle housing developments to tear down old houses with large lots that provide a home for many trees is high. This would be a big mistake as once gone most will never be replaced.

I suggest opening up a forum(s) to elicit more creative and thoughtful solutions to our housing crisis.

Thank you for your time,  
Meghan Lambeth

[REDACTED]

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**From:** Maureen Niwa <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:19 PM  
**To:** Public Hearings  
**Subject:** You must stop urban clear-cutting now!

Dear Mayor Lisa Helps & City Council,

I am outraged and horrified that you have plans to destroy more of the precious tree canopy of Victoria and add to its collapse. With increased population, and with it, more traffic within fast-rapid climate change, you are threatening human, vegetative and animal life. As George Monbiot in a recent, award-winning article *Guardian* has argued, humanity approaches the "greatest crisis we've ever faced: the potential collapse of our life support systems."

Since moving to Victoria in 1985, I've been a witness to the destruction of countless trees. Trees are our architecture--they are the draw for tourism, while providing residents with limited relief from the heat domes which are here to stay. **We need our tree canopy.** Clearing cutting Victoria increases insufferable heat, as last week shows.

We need trees and more trees. We need the shade and protection of large, existing, well-established trees. Stop turning Victoria into a city that cannot sustain life.

Trees are living organisms that need to be protected by human rights until they have rights of their own. Do not add to their destruction, to the destruction of the city, and its inhabitants: ourselves.

Sincerely,

MAUREEN NIWA, PhD | Faculty  
English | Arts & Science  
English Placement Counsellor | Assessment & Testing

[REDACTED]  
*Pronouns: she/her*

CAMOSUN COLLEGE | Victoria, BC | [camosun.ca](https://camosun.ca)



On the traditional territory of Lekwungen and WSÁNEĆ peoples.

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:47 AM  
**To:** Public Hearings  
**Subject:** FW: postpone august 04th hearing for more public consultations

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**From:** Mary Jane O'Byrne <[REDACTED]>  
**Sent:** August 3, 2022 3:29 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>; Lisa Helps (Mayor) <LHelps@victoria.ca>  
**Subject:** postpone august 04th hearing for more public consultations

To Whom It May Concern,

I have been a resident of 1260 Oxford St since 1996. I am urging the City Council to hold transparent extensive public consultations regarding " Missing Middle" which has only recently been made public. This is a critical issue and should NOT BE FORCED through due to an upcoming election.

Today's meeting can NOT be considered a meaningful consultation. Many of us are on summer holidays and therefore can not attend. Additionally we only found out due to a neighbor posting a letter to our mailboxes.

There are absolutely NO DETAILS available . PLEASE do not move forward with this proposed by-law. You will be doing an injustice to your community by not acting in an honest and forthright manner, by trying to get something passed without proper notice and proper consultation.

Sincerely,  
Mary Jane O'Byrne, D.TCM R.Ac  
Health Matters Consulting

[REDACTED]

[www.maryjaneobyrne.com](http://www.maryjaneobyrne.com)



[REDACTED]

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**From:** Marty Riley <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:03 PM  
**To:** Victoria Mayor and Council  
**Cc:** Lisa Helps (Mayor)  
**Subject:** Fwd: Missing Middle Initiative Hearing - August 4th

Dear mayor and council,

I recently found out about the MMI after reading an article in VicNews and then speaking with a neighbour.

I am not sure how I feel about this initiative, but I am very sure how I feel about the lack of effort, on the city's part, to engage with the public on such an important issue.

I found out that in order to be able to "engage" on this issue one had to be registered with engage.victoria. I can tell you that prior to a couple of weeks ago, I didn't know engage.victoria existed! I'm sure I'm not the only one. Especially, older residents who aren't internet savvy.

I received a small notice in the mail a few weeks ago about "missing middle housing." Looking at it, my assumption was that it was simply about infill housing, and I did not think that it would have any impact on me.

I now realize that this is a dramatic change in policy for the city that I have lived in for 12 years. I am not actively involved in city politics; however, I am a resident of the city, who has the right to know when major policies are about to be passed that impact to me.

I am not on Twitter,

I am not on Facebook, and

I am not on engage Victoria,

So how am I supposed to know about this?

It seems to me that there should've been a far more comprehensive notice go out to residents about the proposal. That, I would have read, the same as I read the newsletters that come out with my property tax assessment.

**I request that you not vote to pass this policy, simply on the grounds that the attempt to educate and engage with the residents of Victoria has been wholly inadequate! and this should not be rushed through and left to the next council to deal with the fallout.**

Regards, Martha Riley

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 12:35 PM  
**To:** Public Hearings  
**Subject:** FW: trees

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**From:** Moira Walker <[REDACTED]>  
**Sent:** August 4, 2022 11:27 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** trees

Dear Mayor Lisa Helps & City Council, I am concerned & horrified that you have plans to destroy more of the precious, collapsing tree canopy of Victoria.

As George Monbiot in a recent, award-winning article *Guardian* has argued, humanity is facing the "greatest crisis we've ever faced; in fact, we're facing "the potential collapse of our life support systems."

Since moving to Victoria in 1983, I've been a witness to the destruction of countless trees.

We need our tree canopy. The sea of concrete & black top & huge glass towers mean Victoria is becoming an oven. Fixing plastic pipes to fire hydrants (rather than installing public water fountains) will not cool Victoria or its residents.

We need trees--and lots of them. And as even children know, new little saplings cannot compare to the work of large, existing, well-established trees.

What are you possibly thinking? Clearly, you, Lisa, are interested in a legacy. Can this be what you want to be remembered for? Turning Victoria into a ugly, glass & concrete jungle that no one will be able to bike in. It will simply be too hot & nasty looking. Sincerely, Moira Walker, Victoria ([REDACTED])

[REDACTED]

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**From:** Michael Wood [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:37 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing proposal

Attention Victoria City Council and Mayor,

I am writing to express my opposition to the proposed Missing Middle Zoning Initiative.

The proposed change takes critical decisions regarding densification and development out of the hands of elected officials entrusted to make decisions that are best for the community and places those decisions in the hands of developers whose interest is to maximize return on investment. While densification is required for sustainable development, that does not mean that every neighborhood in the city is equally suited for densification as the proposed policy implies. The blanket proposal allowing for 6-12 dwellings/lot is far too coarse to achieve the goal of affordable housing while respecting liveability of neighbourhoods and rights of citizens.

I do not believe that council and city staff have adequately demonstrated that the proposed policy will achieve its objectives. Victoria is geographically constrained and only so many more homes, regardless of size, can be accommodated. Competition for new homes will be high as more Canadians and International citizens see the opportunity to buy in Victoria. Market pressure will ensure the small units are expensive and the population of Victoria will grow due to an influx of people from other locations in Canada and abroad. Local working people will see small dwellings at high prices, and conventional homes will be astronomically priced based on the development potential of the land.

Michael Wood  
1122 Ormond St.  
Victoria BC

[REDACTED]

[REDACTED]

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**From:** Michael Yee <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 1:06 PM  
**To:** Public Hearings  
**Subject:** Support for Missing Middle housing Initiative

Hi City of Victoria

I am the property owner of 2235 Shelbourne st. I am support of the Missing Middle Housing Initiative.  
I think it is much needed for the housing crisis in Victoria and I hope the public will decide to move forward with this policy.

Thank you,

Michael Yee

[REDACTED]

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**From:** Noah Bastedo [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:56 PM  
**To:** Public Hearings  
**Subject:** MMHI

Hello,

My name is Noah I'm a 24 year old electrician, I am born and raised in Victoria and have all but been chased out of Victoria do to the price of living, please pass this initiative so I can continue to live, work, and contribute to this beautiful community.

Cheers from Fernwood,  
Noah

[REDACTED]

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**From:** Natasha Jamal [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:57 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative

Dear Victoria City Council

I am currently a local resident on the border of the Fernwood and Oakland community. These neighbourhoods predominately consist of single family dwellings, one of which I currently live in and own.

I am requesting that we seriously vote in favour to diversify housing choices as single-family residences become increasingly unattainable for young and first-time home buyers.

I would like to ensure we live in a community where we continue to support young hard working professionals, students and families who have a right to live in these neighborhoods. We all benefit from being able to ensure we live in a diverse community with a variety of income levels as we all depend on each other- such as our local barista, market worker, or babysitter as we thrive in building a community that are interlinked with each other.

As housing has unfortunately become a commodity and for investment this is taking away the right to have a home for so many individuals to no fault of their own are being pushed outside the city of Victoria, where many work, go to school in, and even come to for a local play or take part in a community centre program.

Thinking property values will go down is a selfish reason for those who are privileged to own a single family dwelling to not pass the Missing Middle Housing Initiative.

The city is growing and change is inevitable. Let's continue to support to build a thriving community that also prioritizes affordable housing options for everyone who also deserve a home in this community.

Thank you for your consideration and hopeful vote to say yes to the missing middle housing initiative.

Sincerely

Natasha

**From:** Nancy Martin [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:26 PM  
**To:** Public Hearings  
**Subject:** Missing Middle

Dear Council members,

I'm writing as a concerned long-time homeowner in James Bay, one of the areas being considered for blanket rezoning in the missing Middle Initiative. I'm opposed to this being passed tonight without further consultation & re-thinking for the following reasons:

1. It's a complete contradiction in the MMI policy to state that retaining green space and the urban canopy is a priority while allowing rezoning for much larger dwellings that will occupy significantly larger footprints and require increased paved areas for extra parking. How can the green space be retained in this scenario? As an example, please consider the redevelopment of 27 South Turner which proposes a duplex, 2 suites & 2 garages where an old single family home is currently situated. The proposed development requires cutting down 3 bylaw protected trees & paving the entire backyard so virtually no green space remains.
2. James Bay already has a large number of multi-family and duplex zoned properties which I agree do not fully meet the housing needs of this growing city but I think further rezoning should be carefully planned & targeted to avoid neighbourhoods becoming giant parking lots. I agree there should be missing middle housing but not on every single block of every single street!
3. Affordability of homes is a huge issue in Victoria & I fear blanket rezoning will further push up the prices of land. If developers are able to put multi-family dwellings on former single family lots without going through the rezoning process, sellers will raise the selling prices dramatically. Of course that extra cost will be passed on to buyers & the resulting duplexes and multi-family homes will be even less affordable. Large price increases on lots & development properties for sale are already happening in James Bay. Two examples are 557 Simcoe & 227 Government St. Both sellers are citing increased rezoning potential as selling features.

Thanks for considering at least postponing passage of this controversial rezoning so more consultation is possible.p

Nancy Martin  
30 Government St

Sent from [Mail](#) for Windows

[REDACTED]

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**From:** Brenda Dean [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:09 PM  
**To:** Public Hearings  
**Subject:** Middle housing - suggestion

Dear Mayor and Council

Currently per Vic news April 28, 2022 there are 3,156 licensed short term rentals in Victoria. 2,688 or 85% of which are entire homes or condos.

This obviously has impacted both rental and opportunities for purchase.

- 1) Can it be phased out (if you sell, cannot be sold as potential STR) over next 5 years?
- 2) Limited condo buildings to maximum 25% STR - still allow over 30 day rentals so condo is still deemed an investment property.
- 3) With 2,688 STR licenses in 2022 at \$1500 per license = \$4,032,000 approximately.  
So since 2018 it would be reasonable to "guesstimate" approx \$10,000,000 has been generated in fees paid to City of Victoria. It has only been since 2022 that the city staff has had direction to oversee and monitor these properties  
My question here is, if either 1 or 2 suggestions are a viable option, would the City consider it based on the loss of that licensing fee?

Seems obvious to me that with more units available for rental and or purchase would assist with middle housing issue.

With respect  
Olivia Dean



[REDACTED]

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**From:** Paul Barron <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 1:07 PM  
**To:** Public Hearings  
**Subject:** MMHI response : Current council morally has no remaining mandate; leave it for the next council

Hello

I would like to add my voice to the view that the current council has left the MMHI decision -- a very important proposal for the city -- to too late a date in their mandate. It is irresponsible of them to saddle the next council with the results of such a potentially important decision.

Let the next council bring it forward, amend it or throw it out as they see fit.

Other than that, I think encouraging missing middle housing is a good idea but this particular approach has too many flaws and tramples property rights.

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Paul Barron  
Victoria resident  
[REDACTED]

## Missing Middle Comments to Victoria City Council

Philip Calvert

August 4 2022

- Good evening. My name is Phil Calvert. I'm a Victoria resident and I thank you for this opportunity to speak to you on this important issue.
- I support the principle of the missing middle in my neighbourhood and across the city. Victoria is in a housing crisis and many have spoken to this.
- But I don't support THIS missing middle initiative. I'm not going to repeat comments others have made about height, massing, setbacks, and so on. I agree with most of them. But I want to make three quick points and offer a suggestion.

### 1. Consultation Process

*The consultation process is flawed and inadequate.*

- This Initiative has been a long time coming, but genuine, useful consultation on the details of the MMI have been too limited. Earlier consultations with a small number of people obtained agreement on the principle of the proposal, but until we had details – details that have changed since being released—people have had no concrete understanding of the actual impact on neighbourhoods.
- We are at the public hearing stage for this important proposal, in the middle of the summer, just after the August long weekend, and following a presentation by city staff last month. This is not enough time. Rather than pushing the MMI proposal through now, council should leave the final decision to the new council to be elected on October 15. They will be accountable for the impact of these new bylaws. I urge that council allocate more time for broader consultation and for revision by city staff, and that the next council, as a priority put forth a revised proposal that fully considers the range of views of Victoria citizens.

### 2. Environmental Considerations

*The MMI has serious environmental implications for construction waste and tree cover.*

- This council prides itself on its commitment to sustainability, and should be proud of what it has accomplished in that regard.
- The proposed missing middle bylaws, however, could have significant environmental consequences.

- In further encouraging new builds and thus the destruction of existing buildings—single family dwellings and smaller, older and less lucrative multiplex or apartment buildings—the bylaws will further lead to more construction waste going into landfills. A recent bylaw mandates a certain amount of recycling of construction products, but the city should also encourage—and reduce bureaucratic obstacles for-- options to expand housing that produce minimal construction waste, like conversion of houses to multiplexes, building garden homes, and cracking down on the 500+ illegal Air Bnbs in the city. These should be top priority
- The MMI will likely have a serious impact on Victoria’s tree canopy as well, and in particular the loss of mature trees that help serve as the lungs of the city. Developers replacing them with saplings and claiming to be environmentally responsible is laughable.

### **3. Infrastructure**

*The MMI—which purports to supply more homes for families-- does not adequately address needs for parking and green space.*

- The proposed ratio of cars to unit is unrealistic. I am past the stage now, but I know how much growing and active families need to move around the city—for shopping, school, play dates, work, activities, and so on, often all in one afternoon. This requires cars. The current proposal appears to use housing regulations to engage in social engineering—without significant increases in transportation infrastructure, it either reduces families’ mobility or means much more pressure on street parking
- Families also need green space, yet I see nothing in the proposal, or in parallel proposal from the City, to increase green space in areas where the MMI will lead to increased density.

### **Proposals**

- I am a former diplomat, and diplomats like compromises. One such compromise could be to move ahead now with the MMI upzoning for corner properties only, which would have a reduced impact on neighbourhood streets and which offer the most profit potential for developers.
- This should include increasing the parking space ratio for three-bedroom and two-bedroom units to reflect the realities of family needs.
- While this moves ahead, go back to consultations and the drawing board on MMI bylaws for properties not on street corners. Consult more widely and deeply, and take a serious look at environmental consequences. Move forward with streamlining

houseplexes, garden homes, and other non-destructive option. See how the corner lot construction works out, and use the results to modify the remainder of the MMI.

**Finally**

- This is one of the most important issues facing council and could have an enormous impact on the face of Victoria. Starting the discussion on the missing middle is an important legacy for this council. But its final form and implementation should be left to the next one.

[REDACTED]

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**From:** Jane Gardiner <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 11:14 AM  
**To:** Public Hearings  
**Subject:** Attention: Public Hearing - August 4th, 2022

**Re: Missing Middle Housing - Zoning Regulation Bylaw Amendment**

**Zoning was established for a very good reason.** It controls private land use for the common good and establishes that private property owners' interests must be weighed against the public's interests. It helps to maintain local ecosystems through the need to regulate size, height and design of buildings and to ensure that light and privacy is not taken from existing properties and their gardens. Zoning measures help to preserve property values. **Changes to local zoning requires public consultation with property tax payers.**

**This bylaw amendment delegates development approval to city staff with no public consultation.** Demolition and /or construction could be approved for your immediate neighbouring properties and you will only find out when construction starts. Homeowners have every right to be informed and consulted and to voice their concerns about developments in the neighbourhood in which they live. The house you live in is the most expensive purchase one will ever make and the financial security in a home is critical. It can easily be jeopardized by major changes in the surrounding area. There should be no major development in a neighbourhood without consultation with residents.

**As part of the proposed Zoning Regulation Bylaw Amendment, we request that Council identify a mechanism and forum by which neighbouring landowners maintain their participation in land use decisions in line with the reason zoning laws currently exist.**

While we are supportive of people having a place to live, it is naive to think that this proposal will result in sufficient affordable family housing. There is a wealth of research from other jurisdictions, from community planning experts, as well as developers, that confirms this. Developers will try to amass houses to be demolished in favour of new builds and multiplexes. There is also the risk of loss of affordable rental accommodation in older character homes. Unfortunately it is often less expensive to demolish than to renovate and convert character homes. This is already happening in Fairfield and other Victoria neighbourhoods. One dreads to think what this Zoning Bill could precipitate if it passes. The City of Gardens with its character neighbourhoods may become a Developer's Paradise.

**We are one of thirteen municipalities that make up our region.** None are more that 35 minutes travel time away from the city centre. This 'missing middle housing initiative' should be shared across the region avoiding these drastic zoning amendment measures within our relatively small area.

**The matter of Missing Middle Housing and Zoning Regulation Amendments should be deferred until after the election when a new Mayor and Council can re-consider the bill, take responsibility, and be held accountable for monitoring any decisions made under their watch.**

Respectfully,

Jane and Peter Gardiner

Resident in Victoria since 1968

Homeowners in Fairfield since 1976

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:24 AM  
**To:** Public Hearings  
**Subject:** Fw: Missing Middle process has been too rushed

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**From:** Patricia Laks <[REDACTED]>  
**Sent:** August 3, 2022 8:07 PM  
**To:** Councillors <Councillors@victoria.ca>  
**Subject:** Missing Middle process has been too rushed

Dear Mayor and Council,  
I have concerns about this initiative and I think the process has been rushed. This could have a huge impact on city neighbourhoods and voting on it in the middle of summer is not a good idea. I understand the need for more development but I worry about the loss of gardens and green space that makes our city pleasant. I'm not even sure if this plan would contribute to much more really affordable housing.  
Yours truly,  
Patty Laks

[REDACTED]

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**From:** Tom and Pam Middleton <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 11:52 AM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Initiative: Pause

Re: August 4 Zoning Regulation Bylaw & Official Community Plan Bylaw Amendments & Policy Updates

Dear Mayor & Council

We oppose proceeding with the proposed bylaw amendment at this time and ask that you delay the decision on this initiative.

Proper engagement and consideration of the impacts on neighbourhoods is essential when proposing this kind of transformative change.

Regards,

Tom & Pam Middleton

James Bay Residents



[REDACTED]

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**From:** Pawel Serowka [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:50 AM  
**To:** Public Hearings  
**Subject:** Opinion on the missing middle housing initiative

Hello

I would like to express my strong support for the missing middle housing initiative and the proposed changes to the zoning regulations required by this initiative.

I think that an increase in residential density is absolutely required in order to improve the housing shortage and to increase housing affordability in CRD. The status quo only protects wealthy owners of the single detached houses and it puts everyone else at a disadvantage.

Respectfully

Paul Serowka MD  
Victoria BC

Sent from my iPad

[REDACTED]

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**From:** Peter vangiesen <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 12:43 PM  
**To:** Public Hearings  
**Subject:** proposed changes outlined in the Official Community Plan Amendment Bylaw No. 22-044 &the Zoning Regulation Amendment Bylaw No. 22-045.

Peter Van Glesen  
2540 Blackwood Street, Victoria, BC, V8t 3W1

I support the Missing Middle Housing Initiative as noted in the proposed changes to the OCP amendment bylaw 22-044 AND the zoning regulation amendment bylaw # 22-045

Best,

Peter N. Van Giesen

[REDACTED]

Artist Site: [www.peternvangiesen.com](http://www.peternvangiesen.com)  
twitter @peternvg  
<https://www.facebook.com/peternvangiesen>  
[https://www.instagram.com/peter\\_van\\_giesen](https://www.instagram.com/peter_van_giesen)

[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:46 AM  
**To:** Public Hearings  
**Subject:** FW: Missing Middle Initiative - Stop It Now and Leave It For the Next Council

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**From:** Ronald Bell <[REDACTED]>  
**Sent:** August 3, 2022 7:22 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Cc:** [REDACTED]  
**Subject:** Missing Middle Initiative - Stop It Now and Leave It For the Next Council

Dear Mayor and Council,

I am very distressed with Missing Middle Initiative.

First, from what I have read the initiative is mis-conceived. The elimination of single-family zoning cannot create affordable housing but is just an invitation to developers to destroy the City's residential neighbourhoods.

Second, the process has been marked by deception and misinformation. The proposal shifts without proper notice and is being pushed ahead without the opportunity for proper consultation. Such a massive change to the City's structure needs much more notice to residents to let them know what the real ramifications are and to give them a real opportunity to consider and respond. Administrative fairness requires proper disclosure to those whose interests are affected. Given the magnitude of the proposal, this means each residential property owner should be getting written notice of the intent to rezone their property, and their neighbour's property to allow multiplex housing.

The proposed rezoning is not being requested by the property owners who are going to be affected but is being imposed on them. This is an extraordinary step that should only be taken, if taken at all, after extensive and meaningful consultation to obtain the consent of those whose are directly affected.

The process currently being pursued is a travesty. It is the first summer in two years that people have been able to travel and visit families. As well school is out, and parents have more demands on their time: being with their children and keeping them occupied during the vacation. Pretending that people can effectively engage in a consultation process this summer shows a total lack of regard or concern about public input. Continuing this process during the summer illustrates the problems identified in the recent Governance Report: you are pursuing your personal agendas without regard to the public interest.

Third, in the past the City had a Community Plan that meant something; not the least of which was being the ability to live in the City knowing what sort of community you were going to live in. Once again, this Council is demonstrating a complete disregard for the Community Plan, and for all the work and effort over the years that created the Community Plan.

Mayor and Council: pushing this Initiative through is a disgrace to the democratic process. You were elected to act on behalf of all citizens in the City, not to implement your own private agendas.

This Initiative should be stopped now, and the issue left to the next Council to consider.

Regards,

Ronald Bell  
1005 Pentrelew Place  
Victoria, BC V8V 4J5



[REDACTED]

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**From:** Engagement-External  
**Sent:** Thursday, August 4, 2022 1:24 PM  
**To:** Public Hearings  
**Cc:** Malcolm Maclean; Engagement-External  
**Subject:** FW: Missing Middle Housing Initiative

FYI

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**From:** Robert Boyer [REDACTED]  
**Sent:** August 4, 2022 1:19 PM  
**To:** Engagement-External <engage@victoria.ca>  
**Subject:** Missing Middle Housing Initiative

City of Victoria Council,

Although I am not opposed to the idea of some streamlining of housing development and acknowledge that council is ineffective at approving new housing development I strongly feel that the proposed Missing Middle Housing Initiative is undemocratic.

Reading the proposal and information package, provided with the city, leaves me with the concern that myself and my neighbours will have no say over a development in our neighborhood. I do not trust a city staff member to review and put my interests at heart. I do not trust a city employee to know what look and feel of a new building suits the character of the neighbourhood. I do not trust a city official to understand the nuances of the landscape and ensure that a new building does not tower over and remove the privacy of the existing homes.

There doesn't appear any mechanism for directly affected neighbours of a development to have any say or input on a development that drastically affects their home, their most important investment and their family.

I strongly encourage council to push off this decision for the next council, a council with a fresh set of eyes and the social contract to proceed forward.

Robert Boyer  
106 Moss Street, Victoria

**From:** Ron Brogden [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:55 PM  
**To:** Public Hearings  
**Subject:** Re: Missing Middle Housing Initiative: Zoning Regulation Bylaw and Official Community Plan Bylaw Amendments and Policy Updates

Dear city staff, Mayor and Council.

My name is Ron Brogden and I currently live in Fernwood but am a long time Victoria resident and am active with my local community association.

I moved here in 1985 and the housing opportunities available to me over this timespan are simply not available to folks today. The situation for lower income individuals and youth is especially dire and anything that can be done to address the crisis should and must be done. It is a source of despair seeing neighbours and friends leave this town due to lack of housing affordability.

Missing Middle will not directly result in affordable housing short term but it will help to alleviate housing pressures overall. Reducing that pressure is an important part of the puzzle in addressing our housing crisis and we will see more benefits over time.

With this in mind, I am voicing my strong support for the proposed Missing Middle initiative.

That said, I would strongly encourage council to ensure that this initiative is implemented such that it is financially feasible (the last revision I saw was borderline on this front). Also, prior initiatives such as allowing garden suites in Fernwood were functionally hobbled due to overly restrictive bylaws and so had very low take up.

Also, this initiative needs to be city wide to be equitable and not relegated to lower income level areas generally following the outlines of the "Villages and Corridors" plan. Finally and most importantly, existing tenant protections must be built in or else we will just exacerbate the forced flight of our current citizens.

I appreciate this opportunity to voice my support for this initiative.

Ron Brogden

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:: Will code PHP for food!

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<https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcodegrunt.com%2F&data=05%7C01%7Cpublichearings%40victoria.ca%7C8f2b393f715f4a6e03f808da765b9fc3%7Cd7098116c6e84d2a89eedb15b6c23375%7C0%7C0%7C637952433133927837%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sd=7wgmNWeWQBQ%2BrooUbQBrNIWiSi0Oaz8QK97233EwVog%3D&reserved=0>

**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:45 AM  
**To:** Public Hearings  
**Subject:** FW: MMH Policy/Coriolis Report

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**From:** Renate Crawford <[REDACTED]>  
**Sent:** August 4, 2022 1:21 AM  
**To:** Ben Isitt (Councillor) <BIsitt@victoria.ca>; Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>; Lisa Helps (Mayor) <LHelps@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>; Sarah Potts (Councillor) <spotts@victoria.ca>; Jeremy Loveday (Councillor) <jloveday@victoria.ca>; Geoff Young (Councillor) <gyoung@victoria.ca>; cthorton-joe@victoria.ca; Sharmarke Dubow (Councillor) <sdubow@victoria.ca>; Victoria Mayor and Council <mayorandcouncil@victoria.ca>; Public Hearings <PublicHearings@victoria.ca>  
**Subject:** Re: MMH Policy/Coriolis Report

I am writing to you as a new resident to Victoria, someone who dreamed of some day enjoying retirement in this beautiful city. Unfortunately my "home-hunting" experience over the past year has been quite a negative experience.

I work full time, am pre-approved for financing and yet I have been unable to find a modest 1 or (if I'm lucky!) 2 bedroom condo in Victoria. How do you put in an offer on a listing with 11 other offers, bully offers and investors competing for the property? How do you get excited about a listing when it sells for \$100,000 over the listing price? I have owned in Vancouver, Calgary and Kelowna and yet I've never experienced a real estate market like Victoria's.

I experienced a number of situations where I didn't have time to quickly review strata docs as investors had bid significantly higher than list price. It's pretty deflating when your real estate agent says, "I have a unit in here" and "the developer I worked for alerted me to an investment unit in this (his) building and I'm holding on to it because the rent is awesome!" There were a couple of new developments that were released and sold out in less than a day - how is that possible unless a list of investors is ready to go before pre-sale. I noticed within a short time the units were listed for rent at a premium. I looked at one unit downtown, 400 sf, no parking, no storage that eventually sold for close to \$600,000.

I attended the MMH Open House at City Hall feeling positive and anxious to hear what council members are proposing in an effort to help the "middle" class who are struggling right now with rising interest/mortgage rates and a real estate market controlled, in my view, by developers and investors. I wrongly assumed that the second "M" in MMH referred to "middle" class. I saw the fancy posters and listened to the rhetoric and left upset and with a clear understanding that the MMH policy is not about the "middle" class community seeking to find a "home", just a "place to live".

After reviewing the Coriolis report, it became even more clear to me that developers have had significant input into the policy. In Section 4.1 the report states that the "analysis is intended to test the financial viability . . . from the perspective of a for-profit builder or developer". MMH is not about affordability! How can a home-builder/family compete with a developer? Section 4.3 basically states that developers will compete with homeowners to buy lots and will outbid them if it is profitable enough for them - a developer can easily outbid a family wishing to buy a single family home with a rentable suite, thereby taking away a family's ability to own their own home and a rental suite.

The report mentions several times that financial performance is highest in higher residential value areas (Gonzales, Fairfield, James Bay, Rockland). What happens to more affordable areas? Section 7.1 states that units are expected to

sell for \$650,000 to \$1,750,000 and that the focus is on the higher value neighbourhoods - really? Rockland townhomes are selling for \$1.6 to \$1.8m at present. The missing middle can afford this?

I found it puzzling when I read that a \$50,000 discount would be offered on units without parking stalls. Well, I have first hand knowledge that developers are now selling 400 sf units without parking and storage for \$600,000. How will this \$50,000 discount be monitored? Will developers just raise prices to offset the discount?

Section 2.0 refers to minimum parking near commercial areas - what about other non-commercial areas? Will there be adequate parking provided to lessen impact on existing neighbourhoods? What will the City require developers to do other than make a substantial profit? If construction costs are inflated - are the selling prices also inflated?

Based on my experience over the past year, most units in the MMH higher value areas will be out of reach for most residents. I suspect that real estate agents and investors will be buying up the units and renting them out at a premium. Why aren't more affordable areas of the city being included for "middle" class residents? Where will they live - in the 400 sf downtown 1 bed unit with no parking and storage for \$2500 month (2 bed \$3,000 or higher)?

There are a lot of assumptions being made and I feel that more engagement with the community needs to be done as the policy will have a huge impact on people and neighbourhoods. Developers seem to have a significant reference and input in the policy so maybe now the people (renters, families, etc.) need to have the opportunity to provide real input and feedback.

This is a major policy decision and I'm not convinced that enough research has been done. Hopefully council members will listen to the community (not developers) and put forward a policy that really addresses the real challenges of the middle class, the renters, the families struggling to just find a "home". And, if possible, please change the name of the policy - Missing Middle doesn't apply.

Regards, R. Crawford



[REDACTED]

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**From:** Robin Drain <[REDACTED]>  
**Sent:** August 4, 2022 5:40 AM  
**To:** Public Hearings  
**Subject:** missing middle housing initiative

I want to express my support for Victoria's missing middle initiative. I am a downtown renter who has watched as my building, which offers only tiny one or two-bedroom apartments, has increasingly been occupied by young families with as many as three children. I cannot imagine raising a family in such cramped conditions.

I would rather see more diverse neighbourhoods across the city than segregate any who are not wealthy enough to purchase a house into ever-climbing concrete high rises. I would rather see my city retain its charm and neighbourhoods retain their identities with a mix of housing types than see those neighbourhoods walled off and density relegated to a few blocks. We don't want to become Vancouver, with its giant towers overlooking sprawling single-family neighbourhoods.

Edmonton has successfully implemented city-wide up-zoning, and has not seen the problems with parking or loss of green space that people fear. I hope that Victoria will be able to follow through on this innovative plan and help address this urgent affordability crisis.

Robin Drain

[REDACTED]

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**From:** Robert Farmer <[REDACTED]>  
**Sent:** August 4, 2022 8:07 AM  
**To:** Public Hearings  
**Subject:** middle housing initiative

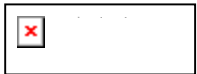
Dear Victoria City council and Mayor

I am writing in support of the middle housing initiative . We all know this city is in a housing crisis , and what we need to solve it is more diversity in the type of housing that will replace the single family homes that will eventually be demolished , and replaced . To replace them with more unaffordable large single family homes is not what we need . I personally want my own children to be able to buy homes and work , and raise their families in this great city , but the way things are , even with lucrative jobs and double incomes its impossible for them to afford a single family home . More diversity in the types of homes throughout the city would make their chances of being able to live here much more likely .

I beg council to act and approve missing middle housing , now is the time to act and on a solution to a very real housing crisis in Victoria.

--

Robert Farmer



Dear Victoria City Council,

I am writing to support the passage of the amendment to the zoning bylaw (No. 1278) to allow the development of “missing middle” housing.

While I work for a local architecture firm, the comments in this letter are my own and do not necessarily reflect those of my employer or colleagues. I mention this only to establish any possible biases, and to note that I presumably have a bit more experience reading zoning bylaws than the average citizen.

I do not know how effective the amendment will be as written but recognize that it is full of several compromises. For some councillors, the affordability measures do not go far enough. For others, the allowed changes are too many. When I first read the bylaw, I felt that it was so prescriptive that no one will actually build any of these projects. I am still not convinced that isn't the case but having tried to mock up an example of what will be allowed on the typical ~35 m x 15 m lot that make up most of the properties that this will apply to, I think I understand the intent.

There are few comments that I can think of that have not already been discussed by council in its many hours of debate. I think the most reasonable concern is the effect that this will have on land values. People much smarter than me have argued that tying affordability to these projects is the only way to keep things in check, which is what has been done, although perhaps not as aggressively as necessary. On the other hand, if we are too aggressive with the affordability requirements, then the projects are financially unviable. Ultimately, it seems like Planning Staff have done financial analyses and settled on the proposed numbers. If we do not trust their expertise, why bother tasking them with the studies?

In theory, increasing housing supply will lower housing costs according to supply and demand. While this would be nice, we need only look at recent economic performance to note that when costs go down, prices remain the same and profits increase. But we're not going to solve capitalism with a zoning bylaw. Doing the right thing is rarely the same as doing the profitable thing, so there must be some incentive to act in the better interests of society.

Much of the opposition to this policy amounts to people not wanting to increase density in their neighbourhoods. I am unlikely to change their minds, but if I may try:

- Current single-family zoning is environmentally unsustainable. By sprawling our houses, we take up more land, and city services must extend further. The more we spread, the more we rely on cars. By increasing density, we make it easier to justify expansions to public transit and cycling networks.
- By not allowing commercial activity in suburbs, they are “unproductive” swaths of land, which are essentially subsidized by residents in denser parts of the city.
- The labour shortage is directly related to the housing crisis. Businesses cannot find employees because no one can afford to work for what's being offered when rent is so high, and home ownership utterly unfathomable. If we want people to work in our restaurants and in our shops, they must have somewhere to live.
- The proposed amendment does not allow for any additional lot coverage than what is already allowed. Parking is required as usual but can be reduced by providing

alternatives. This will compound as density increases, the city will become more walkable, and car ownership will become less and less essential.

- Some Victoria residents act as though this is a small town and bemoan the increase in density. Perhaps this was true many years ago, but this is the capital city of one of our nation's most populous provinces. British Columbia is a beautiful and desirable place to live. To work against housing (a human right) its residents – on stolen land, I may add – is unfair and will ultimately harm us.

Growing up, I was told that we would require at least five Earths if every human lived the way we do in Canada. The lifestyle of car-centric cities to support single-family homes in the suburbs is fundamentally unsustainable. Is it nice? Of course. But we are seeing the results of decades of underdevelopment as we are forced to build large projects full of increasingly smaller units to keep up. We need only look at Vancouver to see this on a much worse scale. By allowing this type of housing in between apartments and single-family dwellings, we may begin to build a more equitable city with options available to people of more diverse income levels.

To paraphrase an idiom: The best time to build a home was twenty years ago. The second-best time is now. We do not know when, if ever, we will have an opportunity to pass a policy like this again. It is not perfect and may be ineffective. The built-in two-year monitoring period should help with that. But some progress is better than no progress, and we have long run out of time to be making no progress.

Please vote to pass the zoning amendment.

Thank you for your time and consideration,

Robert Ingram  
Quadra Village

[REDACTED]

**From:** Steve Arneson [REDACTED] >  
**Sent:** Thursday, August 4, 2022 12:13 PM  
**To:** Public Hearings  
**Cc:** Victoria Mayor and Council; Lisa Helps (Mayor)  
**Subject:** Missing Middle Housing Initiative Public Hearing

Dear Mayor, councillors, staff, and the wonderful citizens of Victoria,

I am writing in this email to voice my support for increasing the supply opportunities with this new zoning.

Regrettably I will not be able to attend in person this evening.

I currently rent at 999 Southgate St and am struggling to find a new home for our growing family. I like to be near Dallas (for the wonderful views, beaches, and most importantly, the dog park) and have a number of friends who are also looking to live in this amazing area. I can walk downtown in 10 minutes and am close to all desired amenities.

We know that the Victoria (CRD) population will not be shrinking any time soon. We also know that land is scarce! Obviously, this equates to an incredible problem, one that we are already seeing the hard struggles of. PLEASE help solve this issue by allowing more housing!

Thank you and I appreciate your time. Good luck today!

Cheers,

--

**STEVE ARNESON**

CEO  
The REINVESTORS Investments  
c: [REDACTED]  
e: [REDACTED]  
w: [www.thereinvestors.ca](http://www.thereinvestors.ca)



#GoBigToGiveBig

The REINVESTORS is proud to be a For-Purpose business supporting KidSport Victoria and The International Network of Hearts

[REDACTED]

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**From:** Scarlet Klodt [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:48 PM  
**To:** Public Hearings  
**Subject:** Missing middle housing initiative

Hello,

I am a resident of Victoria emailing in support of the missing middle housing initiative. My partner and I have an infant daughter and all 3 of us are forced to live in a bachelor apartment due to the inaccessibility of affordable pet friendly housing. Our situation is not unique and is a direct result of the total lack of regulation around the housing market. The average resident of Victoria deserves housing security.

Thank you,

Scarlet Klodt

[REDACTED]

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**From:** Sasha Mosky [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:52 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing Rezoning Package

Hello,

I am writing to voice support of the missing middle housing rezoning package. As a young professional with the hopes of one day owning a home and having a family in the city where I grew up I think this is an excellent initiative and a much needed, practical response to the housing crisis in our city. I support the package as it stands now and hope council will do the same.

Sincerely,

Sasha Mosky

[REDACTED]

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**From:** susanne rautio <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 11:36 AM  
**To:** Public Hearings  
**Subject:** Fwd: Missing middle submission from Susanne Rautio

Dear Mayor and Council

If passed, Missing Middle will lead to the further gentrification of Victoria. It will not provide housing to people who live here but rather to those people coming from away who have the money for brand new homes. It will lead to older housing stock being torn down prematurely which is currently providing affordable housing. Even worse it maybe bought by an institutional buyer:

<https://www.cbc.ca/news/business/real-estate-investment-firms-financialization-housing-1.6538087>

As a home owner I should be supporting Missing Middle as it will increase my land values and I stand to make more money if I choose to sell. But I cannot support it as it is a rash, ill conceived and poorly thought through policy that will negatively impact the most vulnerable in our community for years to come. The group that will benefit the most from Missing Middle are the developers who are greedily combing our communities right now looking for those marginal properties to develop.

**Please vote no to this version of Missing Middle and encourage the next council to study the sensible Missing Middle policies that have been created in other cities like Toronto or Portland.**

Yours truly  
Susanne Rautio



[REDACTED]

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**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 1:20 PM  
**To:** Public Hearings  
**Subject:** Fw: from Hillside Quadra Neighbourhood Action Committee  
**Attachments:** Missing Middle NAC response.pdf

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**From:** susanne rautio [REDACTED]  
**Sent:** August 4, 2022 12:39 PM  
**To:** Councillors <Councillors@victoria.ca>  
**Subject:** from Hillside Quadra Neighbourhood Action Committee

Dear Mayor and Council

If you will not listen to me as a comfortably housed, entitled Gonzales resident maybe you will pay attention to the concerns of the Hillside Quadra Action Committee:

The report does not address the impact on existing renters. Much of Victoria's unofficial affordable housing is in suites in homes. The report acknowledges displacement of renters and states the City of Victoria Tenant Assistance Policy will not apply. No real solutions are proposed.

**There is no analysis in the missing middle reports of potential negative impacts on lower income owners of single-family homes — and how to address them.** One report suggests that it is the smaller and less valuable homes that are redeveloped and the lower income homeowners and their tenants who are forced out. Reports from existing blanket up zonings suggest that up zoning increases property prices and property taxes although there is conflicting research. Some also conclude that in the short term up zoning results in land speculation and no great new numbers of homes.

Susanne Rautio

Dear Mayor and Council,

The Hillside Quadra Neighbourhood Action Committee would like to express our concern about the speed at which the City is proposing to introduce the up zoning of single-family residential properties.

Please be clear that we understand the need for densification and the underlying environmental benefits. There should also be social benefits such as affordability which we believe is lacking in the current proposal that is being rushed through council.

Last week on May 5<sup>th</sup> COTW you introduced the entire report on the same agenda as The Villages and Corridors plan. Both are large reports with multiple attachments and significant changes to zoning and density. My impression was that most of council had not had a chance to wade through the documentation and a one-week extension was granted. While the proposed blanket up zoning would have a significant impact on existing homeowners and their tenants as well as on the future shape of Victoria, most people I have spoken to are completely unaware of it. This speaks to the inadequacy of the public consultation carried out by the City. At least two community land use associations (Fernwood and Hillside Quadra) invited a representative of the project to recent Missing Middle focussed meetings. This invitation was declined.

To allow proper review, I urge you to delay any decision on this initiative.

As a northern neighbourhood Hillside Quadra has traditionally been affordable but this is rapidly changing. We see the impacts of displacement of renters everyday and the core housing need in our City. The Quadra Village Community Centre provides many services to low income residents.

The report does not address the impact on existing renters. Much of Victoria's unofficial affordable housing is in suites in homes. The report acknowledges displacement of renters and states the City of Victoria Tenant Assistance Policy will not apply. No real solutions are proposed.

There is no analysis in the missing middle reports of potential negative impacts on lower income owners of single-family homes — and how to address them. One report suggests that it is the smaller and less valuable homes that are redeveloped and the lower income homeowners and their tenants who are forced out. Reports from existing blanket up zonings suggest that up zoning increases property prices and property taxes although there is conflicting research. Some also conclude that in the short term up zoning results in land speculation and no great new numbers of homes.

<https://communitynotcommodity.com/2022/01/25/fact-blanket-upzoning-leads-to-higher-property-taxes-and-displacement/>

The benefit of the Missing Middle proposal ***in its current form*** accrues to the developer and the analysis is geared to them. Where is the analysis for a non-profit or co-op approach?

*“Our analysis is intended to test the financial viability of the missing middle scenarios from the perspective of a for-profit builder or developer. A non-profit developer or existing homeowner could view the economics of redevelopment differently.”*

*“3. Because the financial viability of missing middle housing is marginal, there is little room for missing middle projects to provide amenity contributions or below market housing.”*

Financial Analysis for Missing Middle Housing  
Initiative, Victoria BC by Coriolis Consulting April 28, 2022

The City of Victoria is supposed to use an equity lens. The proposal in its current form does not seem to provide that. We would like to see a proposal that considers affordability and provides analysis from that perspective.

For these reasons, I recommend that the City of Victoria carry out additional analysis before pursuing this initiative further.

Sincerely,

Rowena Locklin  
On behalf of Hillside Quadra NAC

Although it is a very different context you may be interested in a report outlining three ways that local governments can help reduce impacts of up zoning on lower income homeowners. See <https://challenge.economicarchitectureproject.org/new-models-for-just-development-in-the-housing-market/>.



August 3, 2022

Dear Mayor and Council,

**Re Missing Middle Housing Initiative**

I am writing on behalf of the over 85,000 members of the BC General Employees' Union many of whom live and work in the City of Victoria. Our members, like many working class people living in Victoria and all over this province, are struggling to find affordable housing in their community, facing evictions and increasing rents. As there has been much public speculation about our union's position on what has been termed the "Missing Middle Initiative", we want to set the record straight and publicly confirm our union's position. To put it simply, while we do not oppose increasing density to provide more housing, we note that it will not solve the housing crisis, and we strongly believe council should tackle the affordability crisis by requiring affordability minimums in exchange for increased density.

Victoria's housing needs assessment from 2020 shows that the median income in Victoria as of 2016 was \$52,990 – far below the income needed to afford the prices for houseplexes and townhomes in the proposed "Missing Middle Initiative". In fact, according to the housing needs assessment the majority of people living in Victoria earn less than \$80,000 a year. Renters, despite being the majority tenure in Victoria, make up the smallest percentage of income earners over \$80,000. Density is needed, but without focusing on increasing appropriate density that is aligned to the Stats Can median income for the region (\$52,990) any new density under this program will be out of reach for too many.

It is important that the land economics behind increasing density (even across large areas of the city) are clearly laid out to demonstrate how this has a negative impact on efforts to create affordable communities. Patrick Condon, Chair of the Urban Design program at the University of British Columbia, has written on this extensively. The evidence is overwhelming that in high priced urban areas where the value of urban land is created by the services and amenities around it, increasing the buildable square feet on that land means increasing its value. This value is created by the publicly funded infrastructure adjacent to the land, and the public should reasonably expect that increases in value be tied to an additional public benefit, such as reasonable affordability guarantees that still allow for a modest profit by the owner.

This counters the assertions by city staff that there will be no land value lift, that land value is determined by what people are willing to pay for Single Detached Home use (current zoning), and that the widespread approach to changing the zoning will not have an impact on land values. To be very clear, we believe the reports that contend land values will not increase as a result of upzoning are without merit, and lack any credible evidentiary basis.

**BCGEU headquarters**

4911 Canada Way, Burnaby, BC V5G 3W3  
Phone: (604) 291-9611 / 1-800-663-1674  
Fax: (604) 291-6030 / 1-800-946-0244

We are located on the unceded and shared traditional territory of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish) & Səlil̓lwətaʔ (Tsleil-Waututh) peoples.

We know from extensive research and economic analysis that land value is derived from a number of factors and that much of what drives land values is the access to amenities built around it and how much density a site allows. This proximity to amenities is why we see a run up of land values where public investment is being contemplated. This is why we see ballooning land values as soon as new rapid transit lines are even contemplated. For example, the Canada Line in Vancouver saw significant land value increases along the proposed new track and in Surrey the recent discussion of light rail transit to Langley has resulted in land values spiking due to the speculative frenzy of investors.<sup>1</sup>

It is true that a lower density zoning will not result in the kind of land value increases we see for rapid transit lines or high rise condo towers, however the effect is still going to push land values up because by a stroke of a pen a parcel of land can now hold four times the units of housing it held before. Much of what I have described above has been outlined by BCGEU Treasurer Paul Finch in a 2019 Tye article on Land Value Capture<sup>2</sup>. Zoning for rental can mitigate this effect due to the lower return for rental units versus strata condo units but we know from the CMHC rental market report and the Victoria Housing Needs Assessment that market rentals are well out of reach for many workers already.

The updates to the proposal that provide voluntary bonus density options to contribute an affordable unit or pay \$10 per square foot are not adequate to make a meaningful impact. I urge Council to consider implementing a policy of density trading as is advised in the article and in the BCGEU's Affordable BC plan for local governments, or to build in another framework to guarantee that density is traded in exchange for minimum affordability requirements. This is already rightfully being considered for Victoria's corridors and villages plan and we hope to see Council make bolder demands for affordability and expand it to more areas.

Victoria could look at what places like Cambridge, Massachusetts or Austin, Texas have been able to accomplish by requiring mandatory below market units in new density. Many non-profits are looking to build family sized units but lack the upfront capital to purchase the land for these projects. Partnering with them to include below market units in new density would address those issues and boost the availability of non-profit housing alongside market housing. The CCPA-BC has also written extensively on this and advocated for greater local government involvement in acquiring land for public housing.<sup>3</sup>

Mandating below market units for new density is another way to address the issue of not just exclusionary low density zoning like Single Family Homes but also the exclusionary nature of market prices for housing (both ownership and rental). To this end, the credibility of the figures provided by Coriolis around the financial viability of affordable units in "Missing Middle" forms of housing demands greater scrutiny. The numbers provided greatly inflate the hard cost estimates with no rationale given. A significant concern is the "all in construction cost per square foot". Coriolis is using around \$465, which consists of hard cost of \$340 and additional cost of \$125. This may need to be seriously validated, since the 2022 Altus Guide (which presents the prior year's actual costs in a range) number is about \$175 to \$240 for a three story wood frame townhouse in Vancouver. If we use \$350 as "all in construction cost per square foot", this will easily give us more than 20% profit in the base scenario. Therefore, having Coriolis justify the \$465 will be the key to determine what can actually be expected for profit margins. Better yet, the city should be

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<sup>1</sup> <https://biv.com/article/2018/09/surrey-lrt-collides-higher-land-values>

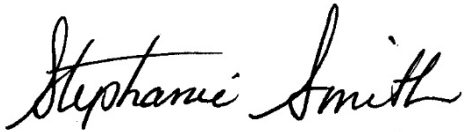
<sup>2</sup> <https://thetyee.ca/Analysis/2019/01/04/Defence-Vancouver-Land-Value-Tax/>

<sup>3</sup> <https://www.policynote.ca/financing-public-housing/>

running financial analysis for housing development proposals that include new density through an independent third party who are not also working for developers.

Like you, we want to see Victoria lead as a livable, affordable city for the diversity of people already here and those yet to call this city home. To that end, we strongly encourage the council to act aggressively to incentivize affordable density upzoning. We hope council will be able to consider the “Missing Middle Initiative” within a broader policy framework that reaffirms the need for affordability requirements when new density is approved.

Sincerely,



Stephanie Smith  
President

KM/JCS

[REDACTED]

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**From:** Sandra Smith <[REDACTED]>  
**Sent:** August 3, 2022 4:47 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Initiative

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

How really sad and misinformed this bylaw proposal is, flying in the face of years of carefully developed Neighbourhood plans and considered community input.

Does this comment arise from NIMBYism? No, I simply want you to recognize that my Neighbourhood provides solid and affordable housing for seniors, renters, students and persons requiring care. Wholesale rezoning with such significant densities and massing will place my neighbours at risk of displacement, destroy the ambience of a beautiful area, and the quality of life in Fairfield.

Please reject this bylaw.

Sandra Smith  
1436 Fairfield Road  
Victoria, BC  
V8S 1E5

[REDACTED]

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**From:** [REDACTED]  
**Sent:** August 4, 2022 9:14 AM  
**To:** Public Hearings  
**Cc:** Malcolm Maclean; Victoria Mayor and Council; Engagement-External  
**Subject:** FW: Missing Middle Housing Initiative

FYI

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**From:** Shelly Urquhart <[REDACTED]>  
**Sent:** August 4, 2022 9:12 AM  
**To:** Engagement-External <engage@victoria.ca>  
**Cc:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Missing Middle Housing Initiative

Hi,

The Missing Middle Housing Initiative decision needs to be postponed until after the municipal election in Victoria, and after the current mayor and council have been removed.

This initiative needs to be further examined, before a decision like this is made.

Thank you,  
Shelly Urquhart

PS: Single family housing is not racist.



[REDACTED]

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**From:** Sharon Walls [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:33 PM  
**To:** Public Hearings  
**Subject:** Missing Middle

I am very much in favour of the new Missing Middle Initiative.

I think it is very important that housing options in Victoria increase and are easier to create than they are under the current SFR zoning. It is important that Victoria be able to create more housing options for younger people and for young families. Multifamily units on a single lot are difficult and time consuming to get approved under the current zoning.

I live in the Gonzales part of Fairfield/Gonzales Community Association where there is a lot of opposition to every kind of multi family development proposal. I have lived in this neighbourhood for 40 years in a heritage designated house and I want to register my support for the Missing Middle Initiative.

Sharon Walls  
304 Robertson Street  
Victoria BC V8S 3X7

[REDACTED]

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**From:** Sue Wilson [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:32 PM  
**To:** Public Hearings  
**Subject:** Postpone the Missing Middle Initiative decision

To Victoria Mayor and Council,

As a Rockland resident, I am adding my support to the submission made in July to Council by the Rockland Neighbourhood Association to Council requesting that a decision on the proposed by-law changes regarding the Missing Middle Initiative be postponed to allow for a much more thorough, detailed and transparent proposal be available to the residents of Victoria.

If ever there was a time for this Mayor and Council to listen carefully and to consider VERY carefully the submissions made by residents regarding this extremely major change in land use planning in the city, this is it. It is extremely disturbing to me as a long time resident and property owner that this monumental decision can be made by an outgoing Mayor and council - of which several council members do not even reside in the city.

Susanne Wilson  
1377 Craigdarroch Rd.  
Victoria V8S 2A8

[REDACTED]

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**From:** Syreeta Wootton <[REDACTED]>  
**Sent:** Thursday, August 4, 2022 10:11 AM  
**To:** Victoria Mayor and Council; Lisa Helps (Mayor); Marianne Alto (Councillor); Geoff Young (Councillor); Charlayne Thornton-Joe (Councillor); Stephen Andrew (Councillor); Sarah Potts (Councillor); Ben Isitt (Councillor); Sharmarke Dubow (Councillor); letters@timescolonist.com; localnews@timescolonist.com; Public Hearings  
**Subject:** I am the missing middle

Lisa Helps and City Council

I am the missing middle and to say I am disappointed in council regarding this initiative and the timing of the public hearing is an understatement and to be honest feels underhanded and full of agenda

I was born in Victoria and grew up in the Fairfield /Gonzales community. In 2020 right before the pandemic and after losing my father I decided to make the move home. I am a single person, I make over \$120,000 a year, I have over \$200,000 to put down on a house and while I still I don't qualify for a house in Victoria, Saanich or Esquimalt, even I know this misguided missing middle deal will not help me or anyone else wanting to move to the Island in home ownership or in gaining a rental property. I haughtily disagree with this initiative. I don't want to move into a 500sq feet characterless apartment. I want to move into a home. I want to raise a family in a house with a yard and I know many many others who feel the same.

To put these meetings in the middle of summer when most people are away, not to mention that this is the first year after covid where people are actually traveling, is incredibly underhanded. To try and push through, at the end of your terms, an initiative that gives your developer friends at Abstract, Aryze and others, carte Blanche to make as much money as they can is also deplorable. This initiative, that removes the consult of neighbourhood associations, will destroy the integrity and character of our neighbourhood's, the reason myself and others actually want to move here in the first place, The Garden City.

The issues of affordable housing have not been satisfactorily addressed, the prices will not go down, the new horrific complex on Fairfield road had a 1000sq foot condo listed at \$779,000 and a 1700sq foot space listed at \$1 599,000 (plus strata fees), neither affordable for the average person or family. Also seemingly unconsidered is that with density property taxes will increase. How do you plan on dealing with pushing out current older home owners, that suddenly won't be able to pay the increase in their property tax on their fixed incomes? One day that to will be you.

The other issue is Air B&B. There are hundreds of unauthorized air B&B's occupying all the previous rental properties, that seems to go completely unaddressed by council. Solve that issue and you will solve a huge portion of the rental issues in the city. Regarding single family housing, what i experienced when I started looking in 2020 was developers artificially inflating housing prices by outbidding myself and families with their deep pockets. They then either build monster houses or massive condo developments while ignoring setbacks, the protected trees, the concerns of the neighbourhood council, and the general integrity of the area.

Shame on you for suggesting this is solved by giving developers license to do all of this without consultation and community input. You have 8 years to address this issue, this is not your issue to fight anymore, leave it for the next council.

Syreeta Wootton



Dr TREVOR HANCOCK

Health Promotion Consultant

494 Ker Avenue  
Victoria  
BC V9A2B7  
Canada

Tel: [REDACTED]

e-mail: [REDACTED]

<https://trevorhancock.org/>

**4 August 2022**

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

Dear Mayor and Council Members,

**Re: Support for Missing Middle Initiative**

I am writing in support of Victoria's Missing Middle Policy. As an internationally recognized expert on healthy cities and communities, I can see and support the many health, social and environmental benefits of such a policy. As the founder of Conversations for a One Planet Region I am particularly attracted by the potential of 'missing middle' housing to reduce our per capita ecological footprint and our carbon emissions. As a member of Livable Victoria I also support this initiative, for the reasons highlighted in my recent column on this in the Times Colonist. I urge you to adopt this policy for the health, social and environmental benefit of current and future generations.

Yours truly,

Dr. Trevor Hancock



*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](http://www.citiesforeveryone.org)

Mayor and Council  
Victoria City Hall  
1 Centennial Square  
Victoria, BC V8W 1P6  
4 July 2022

Re: **Support for Missing Middle Initiative,**

Dear Mayor and Council Members,

I am writing in support of Victoria's Missing Middle Policy that will allow more compact and affordable housing types — multiplexes, townhouses and low-rise apartments — in areas that currently exclude them. This helps achieve our community's strategic goals including increasing affordability and inclusivity, and reducing climate emissions and habitat displacement.

### **Affordability and Inclusivity**

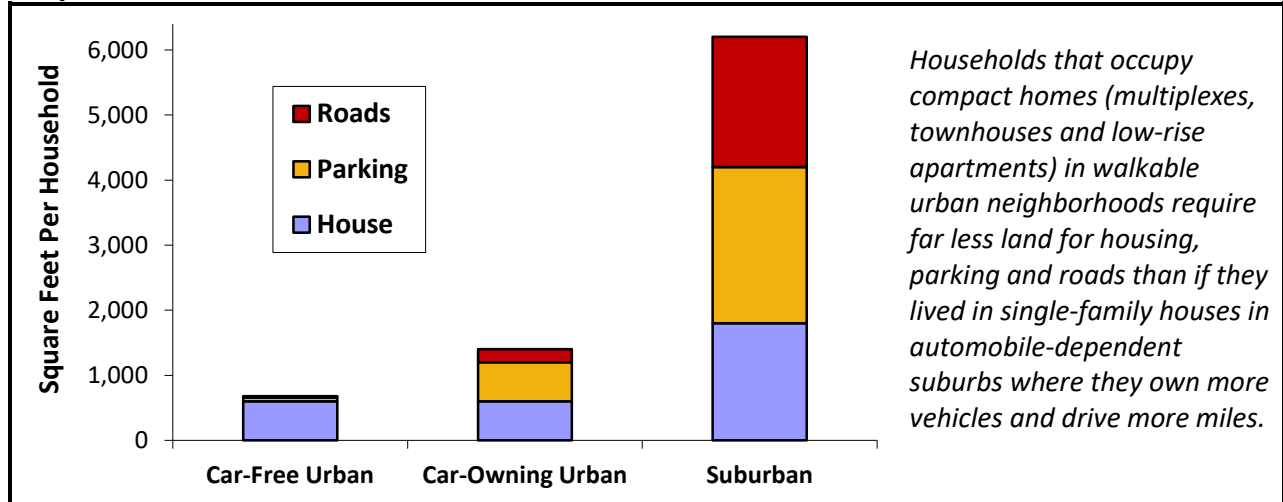
Because they require less land per unit, townhouses cost a third less, and condominiums half as much, as single-family houses. Even if the new units are initially too expensive for lower-income households they increase affordability as occupants of existing lower-priced apartments move into the new units, a process called filtering, and over the long run as they depreciate.

The academic research is clear, adding more moderate-priced housing increases overall affordability. A good summary is Daniel Herriges' column, "The Connectedness of Our Housing Ecosystem" (<https://bit.ly/3zupfkL>). For more technical analysis see "The Effect of Market-Rate Development on Neighborhood Rents," (<https://bit.ly/3zzcyoJ>), and the new book, "Homelessness is a Housing Problem" (<https://homelessnesshousingproblem.com>) which shows that increasing local housing supply reduces homelessness.

### **Emission Reductions and Habitat Preservation**

Residents of walkable urban neighborhoods own about half as many motor vehicles on average, drive far less, and rely more on walking, bicycling and public transit than in sprawled areas. Compact housing types displace much less land per unit, and because residents own fewer vehicles, compact infill reduces the amount of land paved for roads and parking facilities. In total, residents of an urban townhouse or apartment displace about a tenth of the amount of land for housing, roads and parking facilities as they would need with conventional urban fringe development, as discussed in my column, "Seeing the Urban Forest for the Trees" ([www.planetizen.com/blogs/103026-seeing-urban-forest-trees](http://www.planetizen.com/blogs/103026-seeing-urban-forest-trees)) and illustrated below.

### Impervious Surface Area Per Household



A good example of the benefits of missing middle housing is the city of Montreal, where multiplexes and townhouses are common. As a result, housing prices are about a third lower than in peer cities, which makes it a heaven for artists, students and workers, and creates wonderful, compact, walkable neighborhoods where it is easy to live car-free, resulting in true affordability. For more information see, “How does Montreal Maintain its Enviably Low Rents?” (<https://tgam.ca/2UCexlJ>) and my report, “Learning from Montreal: An Affordable and Inclusive City” ([www.vtppi.org/montreal.pdf](http://www.vtppi.org/montreal.pdf)).

Sincerely,

Todd Litman (litman@vtppi.org)

*Cities for Everyone*

[REDACTED]

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**From:** Tim Wilkinson [REDACTED]  
**Sent:** Thursday, August 4, 2022 10:46 AM  
**To:** Public Hearings  
**Subject:** In Favour Of MMHI

Hi there,

I am a resident of the City of Victoria and would like to pass along my vehement support of this initiative to create denser housing to alleviate the crises' that stack up as a result of constrained housing stock.

Victoria needs to change and can no longer hold up the single family home as the most critical type of housing if we want to maintain a functioning, vibrant city.

Thank you,

Tim Wilkinson

[REDACTED]

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**From:** Tara Zajac [REDACTED]  
**Sent:** Thursday, August 4, 2022 2:00 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Public Hearing

Dear Mayor and Council,

I'll keep this brief as I'm sure there will be lengthy discussions about this topic at the hearing.

I've lived in the City of Victoria for almost 20 years and enjoy the changes made to move the city towards being more walkable, bike-friendly and oriented to families. We need construction beyond condos- condos that unfortunately often end up as short-term rentals. We also need to remove some of the red tape that exists with rezoning for what are modest changes to a traditional single-family home. I'm in support of the MMI as I think it is a great step at streamlining needed homes that will add vibrancy and character to our streets. If council waits for a 'perfect' plan, we will never move forward on this issue and will continue to see stagnation in building approvals and with that, rising costs.

Regards,  
Tara Zajac  
Fernwood resident.



[REDACTED]

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**From:** victoria resident [REDACTED]  
**Sent:** Thursday, August 4, 2022 1:28 PM  
**To:** Public Hearings  
**Subject:** Missing Middle Housing

Hello, hope you are doing well,

I have one concern regarding the missing middle housing plan. If the rezoning rules are removed, what is to stop developers from buying every home that comes on the market before a regular person? Without some rules in place, people will be bought out of the market because any lot will suddenly have an increase in value as a potential development plot. Higher density brought by development will not necessarily solve the problem since some people may want to have their own space and not a condo/townhouse.

Thank you for your time,  
Tori

**From:** Victoria Mayor and Council  
**Sent:** August 4, 2022 8:44 AM  
**To:** Public Hearings  
**Subject:** FW: Proposed by-law to allow densification of any lot without public input

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**From:** Ivan and Ali <[REDACTED]>  
**Sent:** August 3, 2022 11:29 AM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Subject:** Proposed by-law to allow densification of any lot without public input

We are unable to attend this Thursday's council meeting, so want to express our concerns via e-mail concerning the proposed "missing middle" zoning motion. Our concerns are:

- There is no provision for public input for any individual densification project, nor for even letting neighbours know what is being planned
- There is no protection for the beauty of some neighbourhoods
- There will be a tragic reduction in green space. This will cause greater run off in heavy rains, less resilience to heat waves, and a less attractive city
- This will just enrich developers who have no commitment to our city
- There is no requirement this increase in density result in affordable housing. Why disrupt neighbourhoods for no good social reason?

Please send this motion back to the drawing boards to ensure our city remains such a lovely place to live and a city which supports its less well off citizens.

Thanks,

Victor Ivan Carlson  
118 Beechwood Ave.

Sent from [Mail](#) for Windows

[REDACTED]

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**From:** Wade Greenwood [REDACTED] >  
**Sent:** Thursday, August 4, 2022 9:31 AM  
**To:** Public Hearings  
**Subject:** Middle Income Housing

I am against this initiative at this time. I believe we should wait until a new council is elected and it is reviewed again.

Thank you

Sent from [Mail](#) for Windows

**From:** Victoria Mayor and Council  
**Sent:** Thursday, August 4, 2022 2:17 PM  
**To:** Public Hearings  
**Subject:** Fw: to spend \$1 billion buying single family homes in mid-sized Canadian cities

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**From:** Wayne Hollohan [REDACTED]  
**Sent:** August 4, 2022 1:34 PM  
**To:** Ben Isitt (Councillor) <BIsitt@victoria.ca>; Charlayne Thornton-Joe (Councillor) <cthorton-joe@victoria.ca>; Geoff Young (Councillor) <gyoung@victoria.ca>; Jeremy Loveday (Councillor) <jloveday@victoria.ca>; Lisa Helps (Mayor) <LHelps@victoria.ca>; Marianne Alto (Councillor) <MAlto@victoria.ca>; Sarah Potts (Councillor) <spotts@victoria.ca>; Sharmarke Dubow (Councillor) <sdubow@victoria.ca>; Stephen Andrew (Councillor) <stephen.andrew@victoria.ca>  
**Cc:** Adam Stirling (CFAX) [REDACTED]; Adam Stirling talk CFAX <talk@cfax1070.com>; susanne rautio [REDACTED] Irwin Henderson [REDACTED] wg Ken Roueche  
**Subject:** to spend \$1 billion buying single family homes in mid-sized Canadian cities

According to the CBC news article.

Victoria is very vulnerable to the direction the housing market is headed, and missing middle could both expedite and compound the problem. The blanket FREE zoning uplift will double or triple the return for the multi-billion dollar investment industry moving into the single-family home market.

This is the link to the full article <https://www.cbc.ca/news/business/real-estate-investment-firms-financialization-housing-1.6538087>

One in four homes sold in the US last year were purchased by Investment firms with billions in assets. The idea of big investors buying single-family homes to rent them out is "has just started in Canada. According to the president of one of this country's largest real estate firms. Some advocacy groups fear families can't compete against money managers with billions in assets.

Core Development Group, a Toronto-based real estate firm, [drew anger](#) last year when it announced plans to spend \$1 billion buying single-family homes in mid-sized Canadian cities. The company didn't respond to requests for comment on the state of its investments.

Blackstone, which describes itself as the world's [largest alternative investment firm](#), with billions spent on single-family U.S. homes, opened a real estate office in Toronto in May to expand on its \$14 billion in Canadian real estate assets.

"They are well capitalized, they are smart and they have the means to make an impact in the marketplace."

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**FIFTH ESTATE**

## Why Canada is losing affordable rental housing faster than it's being built

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- Very frightening' plan by developer to buy \$1B in homes will price renters out: anti-poverty group
- Investors make a fifth of home purchases in Halifax, where real estate prices continue to soar

As middle-class families increasingly struggle to buy homes, analysts say more capital from large firms is expected to enter the Canadian market, further straining supply and affordability for average people.

## Fears of a 'perfect storm'

Unlike average people who usually require a mortgage to purchase a home, equity investors typically buy with cash, meaning they are more insulated from rising interest rates than individuals. Blackstone, for instance, boasts \$941 billion US under management.

ReMax's Christopher Alexander, who closely tracks Canada's market, worries a "perfect storm" could be on the horizon post-2024, as population growth continues and supply chain challenges hit plans for new construction.

- The rising U.S. dollar compared to Canada's currency also makes Canadian housing more attractive for foreign equity investors, Alexander said.
- "They see we have tight supply and no real solution to it through building; we can't keep pace, and they see a good climate for long-term appreciation," he said.
- "Investors aren't thinking about raising their families there; it's much more mathematical and numbers focused. If you are buying a home to live in, it's emotional."

Wayne Hollohan

15 Cook Street

[REDACTED]

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**From:** Warren Magnusson [REDACTED]  
**Sent:** Thursday, August 4, 2022 9:42 AM  
**To:** Public Hearings  
**Subject:** Missing Middle

I fully support the "missing middle" initiative, which is one of the necessary steps towards solving our ongoing housing crisis. It certainly would be helpful in my own Gonzales neighbourhood.

Warren Magnusson  
Professor Emeritus  
Department of Political Science  
University of Victoria

304 Robertson Street  
Victoria BC Canada V8S 3X7  
[REDACTED]