



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

October 4, 2017

Re: New Zoning Bylaw – DRALUC Review

Dear Mayor Helps and Council,

The DRA LUC met with City of Victoria Staff on two occasions where we were informed of the intentions relating to the adoption of the new Downtown Zoning Bylaw. Staff represented that the intent of the proposed bylaw is to reconcile the many site specific zones into 4 zones that maintain existing entitlements. It is understood that changes are proposed relating to parking requirements and that additional permitted uses have also been added.

Comments and concerns raised by committee members are as follows;

- The number of parking spots required per unit is proposed to be reduced for units under 40m² in floor area. Concerns were expressed that by setting the threshold for reduced parking requirements at 40m², construction of only this size of unit will be encouraged over units that may otherwise be made even moderately larger. In the interest of providing the best possible livability, it would be appropriate to set the reduction of parking at a higher threshold (perhaps 55m²) so as to not artificially encourage the production of “micro” units.
- Currently there are some very large buildings proposed in the downtown area that have been achieved by amalgamating several small lots into a single large one. These applications appear at odds with the surrounding land use and will have negative impacts on the character of our city. There appears to be no maximum building size in the proposed bylaw and it may be appropriate for Council to consider establishing one, especially in “Old Town”.
- Residential “Lock off unit” is included as a permitted use, apparently as it was identified within the “Victoria Housing Strategy” document as an action item to encourage affordable housing projects. While the intent of encouraging affordable housing is laudable, how this particular use can achieve this is not explained. This use is more closely associated with “timeshare” condominium and the STVR market, and its inclusion should be perhaps reconsidered or more stringently defined.
- While undeveloped waterfront lands north of the Johnson Street Bridge are proposed to be included within the new zoning bylaw, the similarly undeveloped lands surrounding the Northern Junk property have been specifically excluded. Staff has not provided an adequate explanation for the exclusion of these properties from the proposed bylaw.

- The DRA has repeatedly expressed concerns that allowing uses such as brewpubs and distilleries (which are essentially industrial uses) within residential buildings, can be problematic without requirements for specific mitigation measures. Typically these measures have been required through commitments made through the rezoning process. These new permitted uses without the corresponding special regulations will remove the city's ability to obtain these commitments to mitigate for noises, smells and loading considerations. It may be also appropriate to identify other proposed new uses within the zoning bylaw such as "drinking establishment" that should be subject to special conditions and regulations if proposed in the same building as a residential use.

The DRA LUC appreciates that Staff have shared information on the creation of the new Downtown Zoning Bylaw. The DRA continues to express concerns regarding impacts of proposed policy on the rapidly increasing Downtown residential population and appreciates any consideration Council takes in addressing these concerns.

Sincerely,

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

Ian Sutherland
Chair Land Use Committee
Downtown Residents Association

cc COV Planning