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City Hall
1 Centennial Square
Lekwungen Territories
Victoria, BC
V8W 1P5

December 14, 2017

ATTN: City of Victoria Mayor and Council

RE: Minimum Unit Size (adoption and enactment of Zoning Bylaw 2017)

This letter is written in response to the new proposed Zoning Bylaws on minimum unit sizes in the Downtown area.

We note the absence of minimum unit size requirements in Zoning Bylaw 2017. While the Downtown area has historically not had unit size restrictions, Together Against Poverty Society (TAPS) submits that setting parameters in respect to unit size is essential for the development of suitable rental stock. As such, the minimum unit size for Downtown zones should be in line with the rest of the City and should have minimum unit sizes of 33m² (355ft²).

As we articulated in our January 31, 2016 letter to Mayor and Council, we believe that unit sizes below 33m² would compromise the livability of the City and its housing stock. Citizens of Victoria who are desperately in need of affordable housing deserve to have the option to live comfortably with family, to host friends, and to live with dignity rather than merely exist in tiny spaces. While small units can make sense in some locations and for some individuals, there must be thought to ensuring a variety of size and form built affordable units. Even with the implementation of minimum unit sizes, opportunities for variance will still exist. We can look to other jurisdictions such as Vancouver to see that minimum unit sizes have been implemented. Currently, their minimum unit size is 37m². In Vancouver's Downtown Eastside, the City will allow unit sizes as small as 30m² if they are secured as rental units, and will consider a variance to 23.5m² if it is secured as non-market housing. This approach allows the flexibility of using a smaller unit size where it might be justified, while maintaining accountability to ensure the housing meets the needs and the dignity of the community.

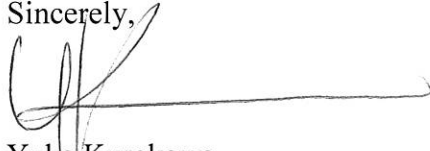
Micro housing proponents argue that not restricting unit sizes helps with affordability. However, an absence of restrictions on minimum unit size serves to further legitimize the notion of cramped living, and does nothing to address the overall cost of housing per square foot. It is

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worth noting that a Canadian Mortgage and Housing Corporation primer on micro-housing published this year defines 'micro-housing' as units below 37m². Establishing minimum unit size still allows for the creation of compact micro-housing.

Affordability and livability are both crucially important in serving the interests of low income Victorians and it is our view that allowing developers to build units under 33m², roughly the size of two city parking stalls, compromises livability without a guarantee of increased affordability on balance. For middle and upper class residents, living in tiny condos can be a choice – but for the City's most marginalized - which includes families, people with disabilities, and seniors - appropriately-sized and affordable living spaces are a necessity.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Yuka Kurokawa', with a long horizontal line extending to the right.

Yuka Kurokawa
Tenant Legal Advocate, TAPS
tenantadvocate@tapsbc.ca

Lacey Maxwell

From: [REDACTED]
Sent: December 14, 2017 2:54 PM
To: Victoria Mayor and Council
Subject: 2017 Zoning Bylaw

To Victoria City Mayor & Council,

I have some concerns that I would like to share regarding the proposed 2017 Zoning Bylaw.

Council has rightly promoted transparency in the actions of the City, but this proposed bylaw appears to promote a new and very much opaque way forward for developers. Gone will be the need for a number of property owners (who will see their properties automatically up-zoned with this bylaw) to go through the much needed rigour and oversight required for re-zoning. With this new bylaw there will be no public input or council scrutiny required for some potentially massive projects.

This bylaw has been promoted as a housekeeping initiative, however it would seem there will be some considerable change in property entitlements for some owners/developers. Most alarming is the effect this will have in Old Town, where all uses will be standardized, and the maximum densities permitted by the OCP will be enshrined for all properties under this bylaw. This of course would serve developers well, as there will effectively be no requirement for further re-zonings and no impediments to the assemblage of entire city blocks; leaving approval solely up to the planning department and only the very opaque Development Permit System governing the process for potentially massive developments.

There is no imperative for this major bylaw change to be pushed ahead regardless of the several applicants apparently waiting for this to happen. I understand the complexity of the current multiple zones causes an inordinate amount of work for the city, however this blanket change does not serve the public good; the 2017 Zoning Bylaw requires meaningful changes before it is enacted.

As a lifelong resident and homeowner in Victoria, I respectfully request that Mayor and Council reconsider the adoption of the new zoning bylaw and ensure development in the city continues to be a transparent process that includes public consultation and council oversight.

Thank you,

Patrick Jones