

September 10, 2024

City of Nanaimo
411 Dunsmuir Street
Nanaimo, V9R 5J6

For the Attention of: Mayor & Council

**Re: Bylaw 7266 A Bylaw to Regulate Development Off-Street Parking
Unintended Impacts for Form, Character, and Housing Affordability
Comments Based on a Nanaimo Multi-Family Infill Experience**

We are writing in support of proposals advanced by Strong Town Nanaimo's *People Over Parking* report which recommends changes to residential off-street parking minimums as set out in the City of Nanaimo's Bylaw 7266.

In particular, our intent is to illustrate the uneven and unintended impact that the current bylaw has on the form, character, and affordability of small lot infill housing – a housing format frequently described as The Missing Middle.

As a focus for these comments, we draw from recent and ongoing experience working to develop infill housing at 360 Stewart Avenue & 345 Newcastle Avenue. Our approach on this site has been to replace one existing single-family home with seventeen new homes offering a range of housing formats from one-bedroom suites through to and including larger three bedroom homes that take advantage of this rare urban waterfront location. The product of these efforts can be seen at www.SeaglassNanaimo.ca.

Infill housing is always more difficult than greenfield housing. Solving yesterday's problems inevitably turns out to be time-consuming, expensive, and uncertain. On the other hand, and particularly at a neighbourhood scale, the contributions of infill housing to liveable, prosperous, diverse and sustainable cities can be significant. The additive benefits from incremental reinvestments are often greatly out of proportion to the size of the projects themselves. Reinvestment in neighbourhoods is a contagious thing, small projects provide important cues to those considering future reinvestment decisions. Our point is that these seeds of regenerative community investment are transformative and should be nurtured. At the very least we should be diligent in identifying and removing disincentives that get in the way. In our experience, Strong Towns Nanaimo has identified a profound disincentive for infill development and we support their efforts to recommend changes to this anachronistic bylaw.

Why are minimum parking requirements such a disincentive to small lot infill development? The answer to that question, in part, is that size matters. 360 Stewart Avenue, for example, is 66 ft. x 132 ft. This lot size is typical for many of Nanaimo's older neighbourhoods.

An efficient parking layout is one that maximizes the number of parking stalls while minimizing drive aisles. On a 66 ft. lot the only configuration that achieves this efficiency is a double loaded parking arrangement that has the drive aisle in the centre of the property. While this is a practical and efficient parking configuration it yields a housing form that has a very prominent vehicle bias – literally front and centre. This solution proves to be undesirable for many existing neighbourhoods. In the case of 360 Stewart Avenue an otherwise excellent residential proposal prepared by the property's previous owner was rejected by Nanaimo's Advisory Design Panel on this point. We know that City of Nanaimo planning staff will be aware of many similar examples of failed proposals where significant effort and resources have been wasted trying to incorporate parking requirements into alternative housing types in older neighbourhoods. Rigid and intrusive parking solutions that supersede gentler neighbourhood form & character guidelines is an outcome to be avoided.

The Strong Towns Nanaimo document goes on to discuss the cost of providing underground parking -- in the range of \$100,000 per parking stall. As expensive as that sounds -- given the difficulty in accommodating efficient parking layouts within a small site -- our experience is that the actual costs are even higher.

We have so far described unintended and negative impacts on form & character, and on housing affordability. These negative impacts are magnified when one considers that the current bylaw may no longer be an accurate measure of today's parking requirements in a world that provides so many transportation alternatives. Many of these technologies did not even exist when Bylaw 7266 was developed: ride sharing; car shares; electric bicycles; vastly improved pedestrian and bicycle infrastructure, passenger only ferries, etc. And that brief and incomplete list does yet not contemplate even more dramatic changes such as self driving cars which will surely impact future parking expectations within the timeframe of parking decisions made today.

As a final closing remark of emphasis in our support of the adjustments recommended by Strong Towns Nanaimo we point out, from our own experience, a second-order impact of the current parking regulation. As we have worked to future-proof our SEAGLASS project in the context of changing expectations and patterns of use, it has become apparent that proposals for adaptive reuse of expensive but underutilized parking will be dramatically curtailed by fire code constraints. Storage, hobby, or workshop functions that may have provided an alternative reuse of underutilized parking spaces are explicitly discouraged. While these building code constraints are not the subject or focus of the current parking bylaw discussion -- it does bear keeping in mind the importance of decisions taken within a regulatory framework that provides few alternative uses for parking which may be in excess of the actual demand.

Closure

We look forward to your consideration of, and favourable review of the transformative recommendations described in the Strong Towns Nanaimo report, *People Over Parking*.

Sincerely,

Masthead Properties



Doug Backhouse

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