



Subject: Updates to Current Draft of the City of Victoria Official Community Plan (OCP) 2050.

September 11, 2025

Dear Mayor Alto and Members of Council,

The Rockland Neighbourhood Land Use Committee is a group of volunteers that assist City of Victoria staff in notifying community members about proposed land use applications in Rockland to foster a stronger sense of local engagement. We are grateful to city staff who educate us on land use regulations, and Council who value us as community partner. We are not an elector organization and support transparency in presenting at public hearings. We have been performing a listening campaign for over a year now, we've completed a neighbourhood survey, and will provide community feedback on three main sections of the draft OCP including Tenant Protection, Built Heritage, and the Urban Forest.

ABOUT

Tenants make up 66% of Rockland residents. Our vulnerable seniors, and low-income households, are concentrated along the transit corridors and Priority Growth residential zones (Fort Street and Oak Bay Avenue). Over 75 percent of residents in Rockland live in multi-unit buildings, and we have a relatively low number of single detached houses compared to other neighbourhoods.

Rockland has a long history of converting historic homes into multiplexes, subdivided into apartments that are environmentally sensitive to increasing density while preserving the neighborhoods' large tree canopy for urban forest animals. Rockland is the lungs of the City, the center of Victoria's urban forest, and is without a municipal park.

TENANTS

The draft OCP is based on the premise that allowing developers to build market-rate housing can improve housing affordability for everyone. Policy directives that use the language of compassion and care to provide much-needed housing for those in need—often only satisfy unit counts and can lead to displaced communities under the guise of renewal.

Upzoning can result in demovictions. The theory that increasing high-quality supply will reduce low-quality prices has known limitations. In-migration is known to end a vacancy chain locally.

Therefore, we support the [Victoria Tenants Union](#) request to consider a right of first refusal that guarantees displaced tenants an opportunity to return to a unit in the new building with the same number of bedrooms, at their original rent (with standard rent increases), and compensation throughout the displacement period. Unlike [Burnaby](#), and [Ladysmith](#), [Victoria's current tenant protections](#), by comparison offer much less compensation.

BUILT HERITAGE + CULTURAL HERITAGE

Rockland's multiplexes incorporate tenancy with heritage architecture, landscapes, and natural areas that have aesthetic, historic, and cultural importance. They stand alongside BC Tourism attractions like Government House, The Art Gallery of Greater Victoria, Langham Court Theatre, Victoria's Water Tower, and Craigdarroch Castle as draws for tourism businesses that provide walking, running, bus, and cycling tours and who rely on the neighbourhood for this public amenity throughout the year.

Heritage conserving infill as a use is permitted across most of the City, but would only be relevant where a building has heritage value and is considered appropriate for designation. Only a small portion of Rockland would be covered by Heritage Conserving Area requirements. Therefore, we request that City staff assess the significance of Rockland's shared cultural heritage, built heritage, and natural geography, and engage a qualified heritage consultant to assist or lead the research, confirming the suitability of coverage under HCA requirements.

URBAN FOREST: CITY-WIDE

Vancouver Island is located within the Coastal Douglas-fir biogeoclimatic zone. Human pressure from development, agriculture and logging, make it the most at-risk biogeoclimatic zone in BC. The Kwetlal food system, colonially known as the Garry oak ecosystem is a subcomponent of this zone, and emerged after the glacial retreat around 10,000 years ago. According to the Canadian Forestry service, the ecosystem is mostly contained to the Metro Victoria area in Canada. The open woodland character resulted from a millennia of Lekwungen agroecological management and is considered to be a living artifact by the Lekwungen speaking people. In the absence of these activities, the landscape would be dominated by closed stands of Douglas-fir and Grand fir.

While you can find relatively intact Garry oak ecosystems in Regional Parks, 75% of Garry oak trees and modified ecosystems are located on what the municipality refers to as private land. The Garry oak tree, a long-lived, keystone species support over 1,645 co-evolved species of plants, insects, mammals, amphibians, birds, and reptiles (that differ from wildland species) making its preservation crucial. Garry oak and associated ecosystems in this region have a unique local genetic adaptation that would be difficult to re-introduce if lost.

Trees exist on private properties in Victoria that exceed 250 years old, the marker which meets the definition of old growth for coastal forests by the Province of BC, and many of those old trees continue to thrive, vibrating with the rich cultural history of the Lekwungen territory. Naturally adapted to this region to severe droughts and heat, native Garry oak trees serve as vital nature-based solutions to counteract flood risks and the urban heat island effect, particularly affecting vulnerable populations.

Plant ecologist and Indigenous scholar Robin Wall Kimmerer, in her book *Braiding Sweetgrass: Indigenous Wisdom, Scientific Knowledge, and the Teachings of Plants*, advocates for weaving together Indigenous wisdom and scientific knowledge to help mend the relationship between humans and the natural world.

The City's OCP Vision 2050 Reconciliation Actions, Understanding Indigenous Land and Water Management states, that the City will "seek to understand the practices that have supported ecosystem conservation for millennia and work collaboratively to braid Indigenous knowledge systems with Western science in preserving and enhancing natural assets, and in advancing a climate-forward city."

The City of Victoria Draft OCP City bylaws, legislation and process undermine this objective.

- The OCP's new land use class scheme was determined without a City-wide biodiversity assessment on private land, presenting an obstacle to stewardship opportunities.
- Development Permit Areas for all new housing include requirements for protecting the natural environment, its ecosystem and biological diversity; however, the General Urban Design guidelines for the urban forest were crafted in the absence of an Indigenous land manager, licensed ecologists, biologists or urban foresters.
- Tree Protection Bylaw (21-035) has not been updated since provincial housing legislation directives (2022) and cannot provide physical protection for existing trees located within a proposed building envelope.

- We are encouraged that the canopy has grown by 100 soccer fields over 10 years, while adding more than 8,000 net new homes (almost entirely multifamily buildings).” However, the rate of growth dropped by 50% in the last four years, meaning 23 hectares short of the previous four years’ urban tree canopy growth rate.

Therefore, we propose the following urban forest policy recommendations:

- Adopt a City-wide Garry oak species detection tool as part of ongoing urban forest remote sensing updates.
- Create an Urban Forest Technical Advisory group as recommended by the City of Victoria’s Urban Forest Master Plan (2012) with representation from Indigenous knowledge systems, environmental orgs, ecologists, biologists, and urban forestry experts to analyze government and third-party data, such as urban forest remote sensing, and report their recommendations to Parks + Urban Forestry.
- The OCP reduced Landscape Area (Plantable space) minimums from 9% to 6% on every development lot. Plantable space is a leading indicator of canopy coverage.
 - Therefore, increase the Landscape Area (Plantable space) minimums in Priority Growth and Residential Infill Zoning Areas from 6% to 9%.
- A 6 m backyard setback (for example) provides limited opportunity to retain existing large trees, and the “Minimum Required Trees Per Lot” is excessively difficult to achieve when applying spacing requirements in the Tree Protection Bylaw
 - Therefore, increase all setbacks by a minimum of 2m for Landscape area (Plantable space) (i.e., soil area for planting a large species of tree as opposed to a medium size tree) in the Priority Growth and Residential Infill Zoning Areas.
- Update Section (4) Applied Guidelines (Pages 189, 193, etc.) from "INTACT Garry Oak ecosystems" to “and modified Garry Oak ecosystems and Garry oak trees.”

Hay'sxw'qa si'em (Thank you),

The Rockland Neighbourhood Land Use Committee

Resources

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