CP18-11



August 27, 2018

Louise Folk Director, Development Services City of Regina 2476 Victoria Avenue, Box 1790 Regina, SK S4P3C8

Re: Zoning Bylaw Amendment Application 18-Z-10 Rezoning from IB – Medium Industrial Zone to IA – Light Industrial Zone 221 N. Winnipeg Street

Dear Ms. Folk:

Thank you for the opportunity to comment on this application on behalf of Regina Downtown Business Improvement District (RDBID).

Regina Downtown Business Improvement District continues to support the current Office Development Policy contained in Section D5 of the Official Community Plan. According to the office development policy, the key criteria that must be met to develop office uses outside of the City Core (defined as 4th Avenue to the north, College Avenue to the south, Broad Street to the east and Albert Street to the west) include the following:

- Retention of a minimum of 80% of the City's medium and major scale office development within the downtown/central city area (between Albert St. and Broad St. 4th Ave. and College Ave.);
- Not permitting large (major) scale office development (>4000 m2) outside of the downtown/ central city area, except for situations where the office complements an institutional land-use (e.g. university, hospital);
- Regulating the amount of office development occurring within the suburban context (designated areas called Office Areas identified in the city beyond the downtown/central city area), as follows:
 - Maximum building size is 4000 m2;
 - Maximum single user within each building is 2000 m2;
 - Maximum of 16000 m2 within specified Office Areas with phased development of no more than one building per year unless downtown office vacancy rate exceeds 8% in which case no approvals of office uses shall occur in Office Areas until the vacancy rate is below 8%;
- Office Area zone will be created that identifies the appropriate range of office types in order to minimize competition with the downtown;
- Office Area zone will have parking maximums with excess to be located in a structured garage;

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• Requiring submission of a market analysis for proposed new Office Areas outside of the downtown/central city area, providing evidence that the proposed new Office Area will not result in the downtown having vacancy levels above 8% or the downtown/central city area having less than 80% of the City's total medium and major office floor area.

RDBID was a key contributor to the creation of the Office Development policy. We consider this policy to be essential in keeping the City Core the premier employment centre for the City of Regina. While we understand the need to support the reuse of underutilized land and properties in Regina, we are concerned that the proposed office use within this development are circumventing the intent of the Office Development policy. Further, approving office use at this site will set the precedent for increasing the office use square footage in the future.

Currently, Regina's downtown office vacancy rate is at 10.72% which exceeds the City threshold of 8% for approval of future office development. Further, Colliers International states that "Regina's downtown market remains beleaguered by low tenant demand and excess supply." We urge the City to continue to adhere to the Office Development policy and support the development policies contained in the recently adopted Official Community Plan.

Should you have further questions, please do not hesitate to contact me at 306.359.7573.

Sincerely,

NEAT

Judith Veresuk Executive Director Regina Downtown Business Improvement District

Cc Mr. Chad Haidey, RDBID Chair Mr. Fred Searle, City of Regina



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