

June 9, 2025

Mayor and Council  
Township of Esquimalt  
1229 Esquimalt Rd  
Esquimalt, BC V9A 3P1

**Re: Bylaw No. 3089, Off-Street Parking and Loading and Transportation  
Demand Management Measures**

Dear Mayor and Council Members:

We understand that the Draft Off-Street Parking Bylaw, 2025, No. 3089 is scheduled to be presented for first, second, and third readings at the June 9, 2025, Council meeting. The Urban Development Institute (UDI) – Capital Region would like to take this opportunity to provide feedback based on the publicly available materials.

First, we would like to acknowledge and commend the Township of Esquimalt for the comprehensive and progressive direction of the draft bylaw. Many of the proposed changes reflect thoughtful planning and alignment with regional trends, and we are pleased to see the progress the document has made since its earlier drafts.

**A few notable highlights include:**

*Improved Alignment with Regional Practice:* The updated structure and content better reflect current planning approaches being used in other municipalities, providing a clearer framework for applicants and promoting consistency across jurisdictions.

*Designated Frequent Transit Area:* Introducing this designation and applying reduced parking requirements across much of the Township is a very positive

step. It supports higher-density development in walkable, transit-supported areas and encourages more sustainable modes of transportation.

*Transportation Demand Management* (Table 3): The new scalable TDM framework is a major improvement, providing practical options for developments of various sizes and types, while still supporting the Township's broader transportation and climate goals.

*Electric Vehicle Parking* (Section 15): Increasing EV readiness is desired by the Township, and we support the intent of this section. That said, we recommend revisiting section 15(2), which restricts chargers from being placed within the minimum parking stall dimensions. In practice, chargers are often installed at the end or between stalls without impacting circulation or usability. The current wording may unintentionally require larger stall sizes and reduce efficiency.

*Commercial and Industrial Parking Ratios* (Table 1): These have been substantially improved and now reflect ratios that are both reasonable and more consistent with those applied in other communities.

*Loading Space Supply* (Section 19, Table 6): The inclusion of loading requirements for multi-family projects is understandable. While it may add to the parking count, the flexibility provided under section 20(2)—allowing a standard stall to be used—helps make this feasible, particularly in Frequent Transit Areas where overall stall counts may still be reduced compared to the previous bylaw.

*Bicycle Parking* (Table 7): The increased requirements for bicycle parking, including higher ratios and allowance for stacked/vertical storage, are positive steps. While some commercial ratios may appear high, they are justifiable given Esquimalt's urban context and proximity to Victoria, which has some of the highest cycling rates in the country. For future consideration when reviewing utilization versus requirement for bicycle parking, we suggest reviewing the City of Surrey's off-street parking for bicycle parking spaces report: [Full report by Surrey City staff](#).

**We respectfully offer a few additional recommendations:**

*Gross Floor Area (GFA) Definition*: Currently, utility and ancillary areas such as electrical rooms and storage/locker rooms are not exempt from the GFA calculation in underground parking. These areas do not generate parking

demand and should be excluded to avoid unnecessarily inflating parking requirements.

*EV Parking Requirements for Commercial Uses (Table 5):* Requiring 20% of commercial stalls to be EV-ready may be too high, particularly for smaller-scale developments. A 10% requirement may better balance feasibility and forward-looking infrastructure needs.

*Change of Use:* The proposed bylaw appears to trigger full EV, bike, and scooter parking requirements for changes of use in commercial spaces. This could create a significant barrier to new tenants or small businesses, particularly in existing buildings. We suggest exempting minor changes of use from these provisions and delegating any resulting commercial parking variances to staff to streamline the process and reduce unintended impacts.

In closing, we appreciate the Township's work in modernizing its off-street parking regulations and believe that, with the inclusion of the above considerations, the bylaw will be well-positioned to support smart, sustainable future growth and change of use.

Thank you for considering our input in advance of your June 9th meeting.

Sincerely,



Leah Bell, Policy & Corporate Relations Manager  
Urban Development Institute - Capital Region

Cc: Bill Brown