



2024 February 27

**Mayor and Council
City of Victoria**

Re: JBNA CALUC Hearing for 50 Government Street

Dear Mayor Alto and Members of City Council:

This letter summarizes the second CALUC hearing for the subject project, hosted by JBNA on February 14 2024 via Zoom videoconference. A video recording of the proceedings is available at <https://youtu.be/3c9svJ1R4A0>, starting at 37:50. Presenting on behalf of the applicant, Oeza Developments, was Will King, Principal Architect, Waymark Architecture. Approximately 160 people were in attendance.

The subject lot is highly visible, located at the crown of the “T” intersection of Government and Battery. The original building is a 1910-era purpose-built duplex that was converted to a 4-plex in 1950. It is situated amidst a range of century-old single-family dwellings, most of which have been very well-maintained and converted to add accommodations. Battery Street is a Heritage Conservation Area, and several houses nearby are also designated.

The revised proposal is substantially different from what was presented to JBNA on April 12 2023. This proposal contemplates 16 strata/condo units in two 4.5-storey buildings offset towards diagonally opposite corners of the lot, joined by stairwells and walkways. The proposal includes eight studio units, six 1BR apartments, and two 2BR+den apartments. Only one off-street parking space is proposed, for a car-share. Additional bike parking, storage, and amenities are provided to offset the lack of parking.

The neighbours to this proposal expressed unanimous and vigorous opposition to it. Although appreciation was expressed for reductions in height from the previous proposal, strong objections were still registered, with themes and comments summarized as follows.

Unit mix and affordability:

- 14 of the 16 units are studio or 1BR configurations that are unsuitable for families and do not promote long-term tenure
- There appears to be no provision for below-market housing

Siting and dimensions:

- The site is 586sqm, well below the minimum 920sqm area required for the extant multifamily R3-2 zone
- The side yard setbacks are only 1.36m for 4 storeys, which is well below the 7.5m required under current zoning, and less even than the 1.5m minimum side yard setback that applies to the lowest-density single-family zones
- The rear yard setback is 2.5m, one-third of the 7.5m requirement
- The front yard setback is 5.03m, less than half the 10.5m requirement

- The FSR sought is 1.9, where R3-2 allows for a maximum of 1.2, and up to 2.0 in strategic locations, which this site appears not to be
- Requested site coverage of 59.9% is double that permitted under R3-2 for a 4-storey structure

Architecture and design:

- The 4.5 storey design is overly tall and dominates the streetscape
- Many residents view this proposal as a 5-storey structure
- The height and massing cast severe shadows year-round over multiple neighbours
- No private off-street parking is provided for residents or visitors
- The front yard is mostly hard-scaped
- The exterior staircases and walkways will increase noise and reduce privacy for immediate neighbours
- The overall design contrasts starkly with the older heritage nature of the street, and might impair the perception of this part of James Bay as a destination for heritage tourism.
- Interior ceiling heights are specified at ~10 feet, where 8 feet is standard. Over four floors, this raises the building height by ~8 feet and adds construction costs with no gain in floorspace, creating an additional 20% interior volume that needs to be heated and ventilated. It is difficult for neighbours to square this with the Proponent's claims that the building is of reasonable height and fit with the neighbourhood, and compliant with the spirit of energy efficiency and passive building design.

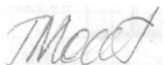
Neighbourhood engagement

- Consultation with neighbours has been lacking
- Adjustments and alterations offered by Proponents largely missed what neighbours requested

Neighbours emphasized they are not opposed to increased density and reasonable development. They would like the Proponent to follow comments provided by City staff, and would prefer gentle densification and missing-middle housing types that promote families and longer-term tenure. This proposal as presented cannot support family housing, which is sorely needed in James Bay. Neighbours expressed frustration with the amount of time and stress this project has caused.

This proposal continues to reach well beyond what neighbours consider appropriate for this site. As before, the JBNA CALUC requests future community consultation be required in the event that an alternate proposal be advanced that differs significantly from the current approved use for this site.

Yours truly



Trevor Moat
JBNA CALUC CO-Chair

JBNA ~ honouring our history, building our future