



October 7, 2024

Mayor and Council
City of Victoria
1 Centennial Square
Victoria, BC V8W 1P6

RE: 50 GOVERNMENT ST APPLICATION FOR REZONING AND DEVELOPMENT PERMIT

Our application is respectfully submitted to propose a 16-unit multi-family building at 50 Government St in the James Bay neighbourhood.

Our current proposal is an update to address the latest concerns from City staff. It follows updated submissions in May 2024 and January 2024 from our rezoning application in August 2023. We also include descriptions of our changes related to specific comments from Staff.

The proposed site currently has a 4-unit multi-family residential building in poor condition.

Current R3-2 zoning allows for multi-family residential. However, a specific clause in the zoning prevents a multi-family building due to the lot size. While a variance was considered, it became apparent with input from planning staff that a rezoning would allow a better overall proposal.

The Official Community Plan place designation for this site is Urban Residential, and the design guidelines for this designation have influenced our plans.

This concept for a 4-1/2-storey building was presented to the James Bay CALUC in February of this year and to the Advisory Design Panel in June. This proposal represents over a year of work with community members and planning staff to create a building design that will increase housing in the area while considering limitations to the lot size and the City's vision for the future of this neighbourhood. Later in this letter, we provide an overview of community feedback and the related design changes.

During our planning exercises, the proposed building became smaller and had fewer rental units than our first design. However, we believe it better meets the community's priorities. Throughout these changes, we maintain our commitment to climate change mitigation and adaptation. The project will meet, at minimum, Step 3 of the BC Building Code.

The following sections of this letter outline how our proposal will benefit the public within the OCP's policy framework and applicable design guidelines.

AFFORDABILITY:

Our proposal aims to contribute to the community as much as we can with the opportunity we have. This project strives to provide as many new units as we can within the parameters of this site and its surrounding neighbourhood. We are proposing 16 new units, an increase of 12 from the 4 existing. These units will all be provided as market rental.

While the number of rental units available from this project will not be enough to mitigate the housing crisis in our city, a fourfold increase in density on small lots is a big step in the right direction. This project has tried to walk the fine line between a large enough increase in density to affect our housing crisis and a small enough increase in density to maintain the wonderful nature of our James Bay neighbourhood.





Throughout the latest revisions, the project has maintained its overall form as a 4-1/2-story residential building. Since the January submission, our project has not modified the unit distribution or layouts but is now offering these units, including the large top-floor units, to the community as rentals.

COMMITMENT TO CLIMATE ACTION & SUSTAINABILITY

This project is not simply proposing an efficient building envelope or heating system. The project has recognized the amenities in the local area, the ongoing upgrades to the city's bike infrastructure and walkability and the unique viability of car-free living in this part of the world. This project aims to provide a dedicated building for people looking to live a car-free lifestyle. The bike room and bike maintenance area are not buried in a basement or at the back of the building but are showcased from the ground level. This feature of the building will face out onto Battery St, a heritage conservation area, demonstrating that we can have both heritage community and modern systems in the same neighbourhood.

The building, like the units within it and even the site itself, is compact and efficient. The new building will function far more efficiently than the existing building, with 12 more homes on the site, and still reduce car traffic overall.

Furthermore, the site will provide a car-share vehicle with an electric car charging station for the residents and surrounding neighbourhoods. Therefore, even the vehicle used will have a smaller carbon impact on our city than typical cars.

URBAN FORESTS

The existing property offers little to the neighbourhood in terms of greenspace or permeable surfaces. There are no trees on the site, and the entire rear yard is paved up to a separate garage building. The new proposal makes several improvements to address the Urban Forest Master Plan.

This starts with protecting the closest trees to our development in the neighbour's yard to the south. A critical consideration in our proposed massing was to provide space around the larger trees while shifting the rear portion of our project to the north and away from them. This also allows residents of the ground-floor units to access outdoor space under their canopies. In addition to protecting the trees along our property line, this project will provide space for the City to add a new street tree within the SRW. This will add much-needed improvements to the streetscape at the end of Battery St. Finally, our site will provide three new trees in the rear yard to comply with the City's Tree Protection Bylaw. These trees will help shade the western facade of our development and create outdoor landscaped areas for the tenants on the ground floor.

SUMMARY OF POLICY CONTEXT:

The site is currently zoned R3-2, "Multiple Dwelling District." This zone allows up to 6 stories with a max height of 18.5 m (or up to 22 m in certain circumstances), an FSR of up to 1.6 to 1, and site coverage of up to 40%. However, these values are only attainable under certain conditions.

The Official Community Plan (OCP) designates the site as Urban Residential, which is characterized by "attached and detached buildings up to three storeys and low-rise and mid-rise multi-unit buildings up to approximately 6 storeys." Our proposal is shorter, at four and a half storeys. A wide variety of buildings are nearby, some of which are much larger than our proposal. However, we have taken steps to fit our new building into the small area of our block and the surrounding buildings. Because most of the immediate neighbours are single-family homes and only a few stories tall, we have reduced the size of our proposal from 6 stores down to four and a half.





James Bay Strategic Directions

Urban Place Designations*

- Core Inner Harbour/Legislative
- General Employment
- Marine Industrial
- Large Urban Village
- Urban Residential
- Traditional Residential
- Public Facilities, Institutions, Park and Open Space
- Working Harbour
- Marine
- Bus Stop
- Bus route
- Bike lane
- 1 James Bay Village (0.6 km)
- 2 Restaurant (0.5 km)
- 3 Groceries (0.3 km)
- 4 Schools (0.6 km)
- 5 Entertainment (0.4 km)
- 6 Bank (0.5 km)
- 7 Park (0.5 km)

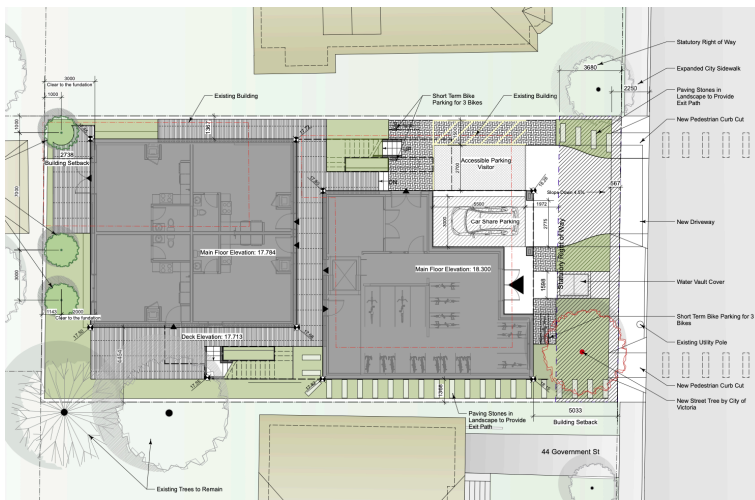
The City's OCP designates this site as Urban Residential. As such, it is unique on the block and meant to be developed differently from the surrounding lots. These Urban Residential sites typically host floor space ratios of 1.2:1, but density increases of up to 2:1 are considered in strategic locations to advance plan objectives.

Our site is a short walk and even shorter bike ride to several community amenities, including the James Bay Village neighbourhood. Given our city's housing crisis, it should certainly be considered a strategic location for advancing our community housing goals. Our proposed density is an FSR of 1.97 to 1, within the guidelines for Urban Residential designated sites.

In the last section of this letter, we have provided a detailed summary of our responses to the priorities and values identified in the OCP.

DESIGN CHANGES BASED ON STAFF AND CALUC FEEDBACK:

The most significant change from our initial submission in 2023 is a reduction in building height and overall floor area. We eliminated the ground floor parking and removed another full storey from the building. We then changed the massing to have circulation in the middle, allowing for a more traditional relationship to the street. Rather than a single larger massing, this results in two smaller massings, each closer in size and appearance to the nearby houses.



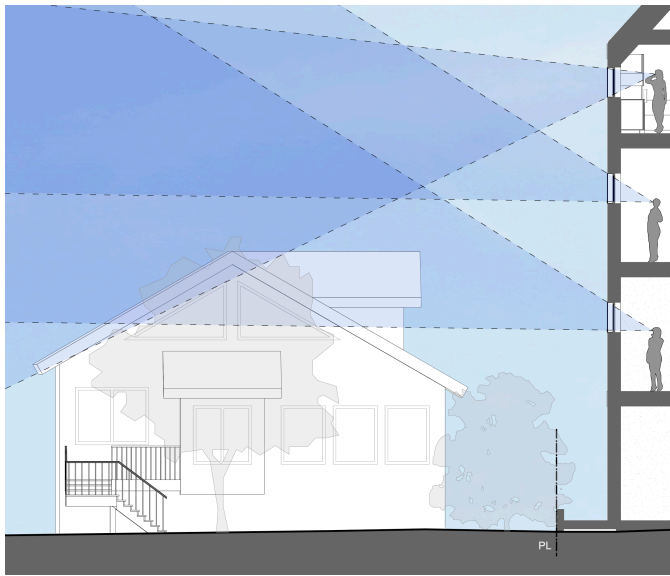
These two massings, front and rear, are offset to provide additional benefits to the neighbourhood. By shifting the east (front) massing to the south and the west (back) massing north, we have protected the root areas of our neighbours trees to the south, and provided more space around our neighbours house to the north.

The roof of our building has been refined and simplified to a common pitched roof, with a common slope and deep balconies set within the gabled ends. A common feature in neighbourhood houses is the use of attic spaces for additional living space. This proposal also adds two bedrooms within the





roof space of the level 4 units. The simple pitched roof also lessens the impact of shadows on the neighbours to the north.



While shadows do not impact the neighbours to the south, overlook and privacy are concerns for the neighbours on both sides. To mitigate this, we placed only high windows on the faces next to property lines, letting in light for the residents of our project and allowing them views of the sky but not of the neighbour's backyard. Privacy is similarly maintained for the residents of our project, as the neighbours can only see the ceiling of the new suites.

While the form, detailing, and finishes of our building are certainly more modern in character than those of the neighbouring houses, familiar elements from the surrounding homes have been incorporated into the design. These include the shape and slope of the roofs, recessed balconies and windows within the roof shape, recessed front porches, and recessed entry vestibules.

Our building also features large windows from the main living spaces looking out over the street.

These changes create a new building footprint at the front of our site that is very close to the footprint size of the existing building. The proposed footprint of the rear section is set primarily over the existing garage and paved area. The resultant open site space will be utilized to improve stormwater management with on-site rain gardens. Since our submission in January of 2024, we have made additional revisions to our site plan as requested by City staff. These include a further reduction of paved surfaces at the front of the site, integration of site servicing vaults into the necessary paved areas and new locations for exterior bike parking to increase the garden and planting areas even more.





These developments to our project design have resulted in the proposed zoning information:

PROJECT INFORMATION TABLE		
	EXISTING (R3-2) ZONE REQUIREMENTS	PROPOSED
SITE AREA	920m ² min	586m ²
TOTAL FLOOR AREA		1141.39m ²
FLOOR SPACE RATIO	1.2:1 up to 2.0:1	1.94:1
SITE COVERAGE	30% for 4 stories	59.15%
OPEN SITE SPACE	30%	41.94%
HEIGHT OF BUILDING		15.92m
NUMBER OF STORIES	6	4.5
BUILDING SETBACKS		
FRONT YARD	10.5m	5.03m
REAR YARD	1/2 building height (7.96m)	2.738m
SIDE YARD (NORTH)	1/2 building height (7.96m)	1.36m
SIDE YARD (SOUTH)	1/2 building height (7.96m)	1.36m
COMBINED SIDE YARDS		2.72m
RESIDENTIAL USE DETAILS		
TOTAL UNITS	(4 existing units)	16
UNIT DISTRIBUTION		2 2-bed + den, 6 1-bed, 8 studio
GROUND ORIENTED UNITS		4
PARKING		
CAR PARKING	18	2
ACCESSIBLE PARKING	1	1
LONG TERM BIKE PARKING	18	30
CARGO BIKE PARKING	0	4
SHORT TERM BIKE PARKING	6	6





SUMMARY OF RESPONSES TO OCP, AND DPA GUIDELINES, CALUC FEEDBACK, AND ADP COMMENTS:

Our team has responded to several key policy goals identified in the OCP, summarized in the table below.

OFFICIAL COMMUNITY PLAN	OUR RESPONSE
Strategic directions identified in the OCP for the James Bay Neighbourhood:	
<ul style="list-style-type: none"> • 21.15.1 A densely populated mixed-used neighbourhood with a Large Urban Village. 	<ul style="list-style-type: none"> • Our proposal adds 12 more units to the neighbourhood.
<ul style="list-style-type: none"> • 21.16.1 Maintain a variety of housing types and tenures for a range of age groups and incomes. 	<ul style="list-style-type: none"> • The building is dedicated to car-free lifestyles.
<ul style="list-style-type: none"> • 21.16.3 Maintain an interesting diversity of land uses, housing types and character areas 	<ul style="list-style-type: none"> • Our building provides a modern counterpoint to the heritage buildings around it.
Values and goals identified in the OCP:	
<ul style="list-style-type: none"> • 3.2 One Planet Living: Become a city that lives and works within its fair share of the planet’s resources. 	<ul style="list-style-type: none"> • This building is dedicated to car-free life styles, is built to modern energy standards and with low embodied carbon building materials wherever practical.
<ul style="list-style-type: none"> • 3.5 Life Cycle Planning: Anticipate the needs of citizens throughout their lives. 	<ul style="list-style-type: none"> • We are proposing several small units for students, solo living and for downsizing seniors as well as units for couples and those with children. Two larger units are suitable for families
From Figure 4 (pages 19 to 20):	
<ul style="list-style-type: none"> • Land Management and Development: 	
<ul style="list-style-type: none"> A. Victoria has compact development patterns that use land efficiently 	<ul style="list-style-type: none"> A. By increasing the number of homes on this parcel of land, this is supporting compact development patterns and efficient land use
<ul style="list-style-type: none"> • Transportation and Mobility: 	
<ul style="list-style-type: none"> A. Transportation options reduce fossil fuel dependence, help conserve energy and produce low greenhouse gas emissions and other air contaminants. 	<ul style="list-style-type: none"> A. Dedicated to car-free lifestyles, this proposal offers extensive bicycle facilities and Modo carshare
<ul style="list-style-type: none"> C. Services, amenities, buildings, facilities, and public space are accessible. 	<ul style="list-style-type: none"> C. The building offers mobility scooter storage & an elevator.
<ul style="list-style-type: none"> • Placemaking: 	
<ul style="list-style-type: none"> A. Victoria is vibrant and attractive with unique character and sense of place. 	<ul style="list-style-type: none"> A. We are using traditional patterns of architecture in a modern, efficient building.





OFFICIAL COMMUNITY PLAN	OUR RESPONSE
<ul style="list-style-type: none"> Infrastructure: 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> D. Rainwater resources are carefully managed with collection, diversion, and re-use practices that moderate runoff volumes and maximize water quality. 	<ul style="list-style-type: none"> <ul style="list-style-type: none"> D. Our proposal increases the amount of permeable surface from the existing conditions of the site
<ul style="list-style-type: none"> Climate Change and Energy: 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> A. Victoria and Victorians are more resilient to climate change and energy scarcity and costs. 	<ul style="list-style-type: none"> <ul style="list-style-type: none"> A. Our project will be built to remain comfortable in extreme weather and provide clean indoor air even in smoke events.
<ul style="list-style-type: none"> <ul style="list-style-type: none"> B. New and existing buildings are energy efficient and produce few greenhouse gas emissions 	<ul style="list-style-type: none"> <ul style="list-style-type: none"> B. We will design and build to modern efficiency standards, remove combustible fuels from the building and provide car sharing and car-free lifestyle options for residents.
<ul style="list-style-type: none"> <ul style="list-style-type: none"> C. Transportation options reduce fossil fuel dependence, help conserve energy and produce low greenhouse gas emissions and other air contaminants. 	<ul style="list-style-type: none"> <ul style="list-style-type: none"> C. Our project emphasizes bicycle infrastructure and adds density to an already walkable neighbourhood.
<ul style="list-style-type: none"> Housing and Homelessness: 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> B. A wide range of housing types, tenures and prices gives residents choices 	<ul style="list-style-type: none"> <ul style="list-style-type: none"> B. Our proposal adds to the range of housing types available in Victoria, including small, medium and larger market rental units.

CALUC FEEDBACK	OUR RESPONSE
Loss of natural light and effects of shadowing on neighbouring properties	We have kept the building to 4.5 stories and refined the roof shape to reduce the impact of shading on the neighbours
Loss of privacy as almost all windows overlook neighbours' lots and not over the street	We have revised the size and location of windows on the north and south sides of the building to become wider, high level windows that offer a view across the larger neighbourhood, but restrict views to the neighbours yards below.
Lack of suitable setbacks, greenspace, and landscaping for a building this tall	Our proposal now increases the amount of Open Site Space relative to the existing condition. Additionally, we have removed paving and other pathways where possible, offering even more space for landscaping.





CALUC FEEDBACK	OUR RESPONSE
Additional parking pressures, as this proposal provides fewer spaces than required in an area where parking is already scarce	As a response to these concerns, we have decided to focus on providing housing for car-free residents, thus reducing the traffic impact even more than the current conditions. Our design emphasizes good TDM strategies, which we have developed in conversation with City staff to compensate for the lack of car parking.
Incompatibility with the heritage character of all surrounding streets (Government, Battery, and South Turner)	The proposal uses familiar shapes, massing, language and patterns of typical houses in the city. These have been reimagined in a modern building, emphasizing the integration of new forms into an older neighbourhood.
Loss of a century-old fourplex that otherwise appears to be an ideal candidate for gentle densification under the recently-adopted Missing Middle Housing Initiative	The existing fourplex is not in good shape, and would be technically difficult and expensive to renovate. The new proposal adds 12 more units to existing site.
ADP FEEDBACK	OUR RESPONSE
ADP members were complimentary of the design and strategies to provide housing on the small lot. A motion was passed to recommend approval without any revisions.	Our current proposal is substantially the same as the one presented to ADP. There are only minor revisions to allow more space for trees in the rear yard.

SUMMARY

This proposal meets the overall objectives of the City and the Province and improves the housing available in the neighbourhood. It increases the diversity of the housing stock available in the James Bay area while respecting the scale and character of the neighbourhood. It is a forward-thinking project dedicated to car-free families and built to reduce the energy needs of our homes. This project represents the very type of development our city needs to encourage to meet our climate action goals and gently increase the density in our existing neighbourhoods.

Respectfully,

Will King, Architect AIBC, MRAIC. LEED AP

