



STRONGITHARM CONSULTING LTD.

October 16, 2023

Mayor Alto & Members of Council
City of Victoria
1 Centennial Square
Victoria, BC V8W 1P6

[RE: 422 Edward Street / 448 Wilson Street Rezoning Application](#)

Dear Mayor Alto & Council:

We are pleased to submit a revised application for Rezoning of 422 Edward Street and 448 Wilson Street to permit a proposed residential development comprising of 10 ground oriented townhome units comprising of 3-bedroom upper units and 10 1-bedroom lower units. Our original submission earlier this year envisioned fewer, luxury townhomes for sale. We believed our revised approach will create greater opportunities for more affordable home ownership options, for both family orientated 3 bedroom units and particularly for first-time homebuyers. The proposed application is tailored after the Missing Middle by-law, but adhering to the specific terms of the bylaw would detract from the comprehensive plan created. Our original submission we made just prior submission to the passing of the middle missing housing by-law. We feel our new submission not only provides an affordable housing solution, but also provides improved accessibility to a well used community path on Russell Street.

[1. Site Background and Proposed Development Site](#)

The proposed development is a 1,468m² parcel, located at 422 Edward Street and 448 Wilson Street in the Victoria West neighbourhood. The site fronts three streets; Wilson Street, Edward Street, and Russell Street. Russell Street is largely a pedestrian corridor that also provides driveway access to several homes.

The Victoria West Neighbourhood is comprised of a mix of housing forms. With its proximity to many amenities, the neighbourhood has attracted a number of small and larger scale infill developments, from detached to semi-detached to townhouses to small apartments. Some projects currently proposed within the vicinity of the site includes;

- "Wilson Commons", a 34-unit townhome/small apartment project with lock-off suites at 208 Wilson Street;
- A 10-unit townhouse project at 315 Edward Street and 811 Mary Street; and,

- A 31-unit rental apartment building on about a 929m² lot approved at public hearing in August 2022.

We believe the proposed townhouse project will be a positive addition to the diverse nature of the neighbourhood.

2. Land Use Policy

Land use policies in Victoria West are guided by two principle documents: The City's Official Community Plan (OCP) and the more recently adopted Victoria West Neighbourhood Plan and finally the Missing Middle Guidelines.

The OCP and Victoria West Plan designates the site as "Traditional Residential". The OCP allows multi-unit buildings, including attached residential and apartments on arterial and secondary arterial roads, permitting townhomes. Specifically, Section 6.1.5 states that:

"Traditional Residential consists primarily of residential and accessory uses in a wide range of primarily ground-oriented building forms including single, duplexes, townhouses and row-houses, house conversions, and low-rise multi-unit residential and mixed-use buildings up to three storeys in height located along arterial and secondary roads."

The Victoria West Neighbourhood Plan has similar policies for, and encourages ground-oriented buildings up to 2.5 storeys, supporting ground-oriented townhomes. The Victoria West Neighbourhood Plan supports:

- More options for ground-oriented housing with access to on-site open space as an alternative to single detached houses;
- Townhouses on larger lots where the desired design qualities can be accommodated; and,
- Siting on corner lots or lots with laneways, on lots of at least 18m (60 ft) in width.

Both the OCP and the Victoria West plan supports a density of up to approximately a 1.0:1 floor space ratio. The Victoria West Plan encourages the retention and expansion of the urban forest. The application is supported by policies and objectives contained in the OCP and the Victoria West Plan.

3. Proposed Project Overview

The application requests rezoning from the R-2 (Two Family Dwelling District Zone) to a site-specific RK-VW2 zone. With its 3 street frontages and nearly 1,500m² lot area, the site is a prime

candidate for infill townhomes. A key feature is the proposed unit sizes. All townhomes will comprise of (a) 3-bedroom, 2.5 bathroom units as well as (b) 1-bedroom 1 bathroom unit. The project proposes 10 townhomes split into 2 buildings to: (1) eliminate a continuous single row effect; (2) support retention of mature trees on the site; and (3) minimize parking impacts by conveniently locating the parking area between the two buildings to minimize driveway and parking site coverage.

Table 1, 2 and 3 below provide an overall summary of the proposed project.

Table 1 – Project Summary

	Site Area (m ²)	Zoning	Floor space Ratio	% Lot Coverage	Open space	Total Units	Storeys	Height (m)
Existing R-2 zone	2 lots 1,467.7	R-2	N/A	40%	N/A	4	2	7.6 m and 11 m for public buildings
Proposed	1,467.7	Site specific RK-VW2	0.80:1	47%	43%	20	2.5	11.72m & 8.58m

Table 2 – Upper Unit Mix

Number of Townhomes	Bedrooms	Area (m ²)	Total Area (m ²)
10	3 Bedroom	113.3	1133.4

Table 3 – Lower Unit Mix

Number of Townhomes	Bedrooms	Area (m ²)	Total Area (m ²)
10	1 Bedroom	56.6	566.7

3.1 Site Conditions

The site and site access is characterized by the presence of mature trees both on-site and within the Russell Street right-of-way. The property is slightly crowned in the middle of the property with a more acute crowning within the Russell Street right-of-way. The right-of way is also characterized by prominent rock outcroppings, with a modest pedestrian pathway linking Wilson Street with Edward Street.

The townhomes have been sited to minimize impacts on the urban forest. Working with the project arborist, the building design has been tailored to the site characteristics, proposing narrower townhomes that face a new public connector pathway. Setbacks for the 2 townhouse buildings are staggered, specifically to protect the Chestnut trees along the western property line and mature Douglas Fir trees along the eastern property line. Siting of the buildings and other off-

site infrastructure has taken into account the tree canopy and root zones of the mature trees within the Russell Street right-of way.

3.2 Public Pedestrian Pathway Along Russell Street

Much consideration has been paid to develop a new pedestrian pathway connection between Wilson and Edward Street. The current pathway is a modest, meandering trail that has developed “over time”, simply by the public forging a route in the most convenient way possible. It meets no City standard and does not conform with universal accessibility requirements. A new pathway, offered as a Community Amenity, has been designed with the central objectives of minimizing impacts on the mature trees, limiting impact on the prominent rock outcroppings in the right-of-way and improve accessibility.

A new, accessible pathway is proposed that will have a small portion of the trail sited within the subject lot that will be controlled by way of registered easement. This approach will provide a new hard-surface, accessible pathway and protect most of the natural condition.

3.3 Parking and Bicycle Management

Seven (7) parking stalls are proposed, sited between the two buildings. Each parking stall will have EV charging. There are 3 enclosed bicycle depot's proposed onsite, each housing 14 bicycles for a total of 42 long term bicycle parking stalls, including a maintenance tool station, electric bicycle charging. Six (6) short-term bicycle stalls will be provided, located at the corner of Wilson Street and Russel Street.

There is an expectation that active transportation modes will be the local choice of transportation which is why bicycle parking above bylaw requirements has been incorporated into the design in anticipation of future resident needs. There are three BC Transit route within approximately 250m from the site and grocery stores, retail shopping and personal services are within convenient walking distance. Victoria West Park is within 500m of the site and is within 300m of Victoria West Elementary school.

3.4 Architecture

The architectural plans were prepared by local architect Xeniya Vins, providing a modern design while maintaining a pitched roof motif that is seen commonly along adjoining street frontages. The use of high-quality materials are incorporated into the design, including acrylic stucco, Hardie siding and board and batten, asphalt shingles, and metal fascia. The building design is

aesthetically appealing and environmentally sustainable, reaching higher energy step codes and preventing water intrusion during heavy rain events.

Each townhome entrance will front onto the proposed and newly restored Russell Street public pathway. Each entrance is set slightly higher than the path to allow privacy for the inhabitants and pedestrians. Sensitive night lighting will be provided on the pathway to improve visibility and safety compared to the current pedestrian path. Each unit has an upper balcony that overlooks the park-like street frontage and public pathway. Each rear yard has a privacy screened patio space and secure yard area.

3.5 Landscaping

The landscape plans have integrated new planning to compliment established vegetation and tree regime and incorporates a combination of lower shrubs and larger trees. Larger trees include Red Maple, Dogwood, and Pin Oak. There is an extensive plant list including; Switchgrass, Heather, Camas, Salal, and a variety of ferns. Arbours with climbing plants consisting of Wisteria and Boston Ivy will screen the parking area.

A perimeter fence will be installed to encourage privacy for new residents and adjacent residents. The landscape plan calls for climbing plants along the fenced area that will create a visually pleasing aesthetic to residents and neighbours.

The landscape designers have also thought about planting and amenity beyond the property lines. Landscape boulevards are shown with a “mini-park mews” proposed along the Wilson Street frontage, including benches that would be available for public relaxation and enjoyment.

3.6 SUSTAINABILITY AND PUBLIC BENEFITS

The building, landscaping strategy, and site location all contribute to improving the environment and lessening GHG emissions. Green features to be applied to the project include:

- A high degree of walkability; within walking/cycling distance of employment centers, and commercial, recreational, social, health, and education services;
- Landscaping and stormwater management strategies include the use of raingardens and greening of the site;
- A minimum of Step Code 4;
- Glazing specifications on different building orientations will be considered for maximize solar control and passive heating and solar-gain;

- Low energy lighting systems, including motion sensors will be employed in common areas, Energy Star appliances, and low water plumbing fixtures will be used throughout the project;
- EV charging will be provided to meet all City standards;
- Bicycle depots will have extra 15 amp plug outlets for electric bikes and a bicycle repair station;
- Outdoor water conservation strategies will include water efficient landscaping and drip irrigation systems;
- Construction of a new pedestrian path to meet current accessible pathway standards;
- Planting of native, drought-resistant vegetation on both the SRW and Municipal R/W; and,
- Installation of a small public green space in front of 448 Wilson Street. This area shown on the Landscape Plans will include two benches surrounded by grass and colorful drought resistant trees and plants, providing an enjoyable place to rest..

4. Acknowledgment of the Missing Middle Housing Policy

We received feedback from City of Victoria staff on the option of applying under the Missing Middle policy. We compared our rezoning submission with the Missing Middle zone and a standard townhome regulation. While we could meet the spirit of Missing Middle and core criteria under the Missing Middle townhome zone, the application could not achieve specific elements of the Missing Middle requirements including setbacks, lock-off suites, secondary units, and below-market units.

The Missing Middle guidelines allows up to 12 units on a corner lot and with reconfiguring would allow for 24 units. However, the site constraints, specifically conservation of mature trees and proximity to rocky outcroppings, work against the complying with the guidelines even though the principles of the Missing Middle strategy are being adhered to. The natural site conditions and consolidation of two properties make it problematic to proceed without applying for multiple variances. Therefore, the applicant has decided to continue pursuing rezoning as the most transparent path forward.

5. Tenant Assistance Plan

A Tenant Relocation Assistance policy Plan has been developed. The developer has already made the tenants aware through a letter and has filled in and signed a tenant assistance plan for the current tenants. The Tenant Assistance Policy and guidelines will be fully observed and complied with.

6. CALUC Meeting

A Victoria West CALUC meeting was held November 15th, 2022. A number of favourable comments were made, particularly relating to the siting of the two buildings; preserving as much of the natural conditions as possible; and, improvements to the pathway. Assurances were provided that existing access to homes served by Russell Street would be preserved.

7. Closing

We believe the project is a thoughtful family-oriented infill housing development. The smaller level/units provide an opportunity for:

- Affordable entry into the housing market for first time home buyers;
- A senior downsizing
- a family who may acquire the upper and lower unit to enable an elderly parent to live independently but with the comfort of family living adjacent.

The project is consistent with the Victoria West Neighbourhood Plan's land-use designation and the vision of the Missing Middle policy. The building's finishes and landscaping, amenities, and improvements offsite will contribute to, and support, the vision for the future of the Victoria West community.

We respectfully ask for Mayor and Council's favorable consideration of the application.

Yours truly,



Deane Strongitharm, MCIP, RPP
Strongitharm Consulting Ltd.

cc. Logic Homes Ltd.

attach: