

July 31, 2023

Dear Mayor Alto and Members of Council

Following years of design exploration, diligent development planning and active community conversations, we are pleased to convey our application for the proposed infill rental housing project on the 350-360 Douglas Street property. The proposal provides an important transition from the existing residential high-rise towers already developed on the property to the surrounding heritage neighbourhood context. By replacing a portion of the existing surface parking lot with a new low-rise building, we envision an activated and inviting streetscape contributing to the cherished James Bay character.

The property is in the James Bay neighbourhood, bounded by Toronto Street to the north, Douglas Street to the east, Avalon Road to the south and Huntington Place to the west. Located directly across from Beacon Hill Park and the South Park Family School playground, the site benefits from access to abundant open space and connected pedestrian, cyclist, and transit routes that connect residents to local and regional shops, services and employment destinations.

Since early 2022, we have worked collaboratively to engage with the community through multiple meetings and presentations, and to evolve the proposal in response, as possible, to feedback. A CALUC meeting was held on September 14, 2022; however, the project did not proceed to the formal rezoning application stage within the required six-month timeframe and a subsequent, second CALUC meeting was held on July 13, 2023. The plans now include 3-bedroom units which we heard were particularly interesting to the community. We have also continued to refine the building's exterior materials and look forward to further input from staff and stakeholders through the application review process. Our comprehensive proposal addresses several topics raised through community engagement about site access, landscaping, bird-friendly building design and the need for ongoing communication throughout the development process.

### **Key Elements of the Proposal**

- New infill building replacing a surface parking lot
- Retention of existing 13-storey towers on site and no loss of existing rental units
- Addition of 90 new units of purpose-built rental housing, including family-friendly 3-bedroom units
- More homes in the right place – a walkable neighbourhood, near shops, services, parks, transit and active transportation routes
- Activated streetscapes with walk-up entries to ground-oriented units
- Six-storey building stepping down to four-storeys, providing a transition in scale from the existing 13-storey towers and surrounding residential towers to the heritage neighbourhood context
- Right-sized parking in new underground and surface parking areas to meet calculated demand
- Increase in landscape and open space programming, with new trees and landscaping, a central courtyard, new bicycle parking and rooftop resident amenity areas
- Sensitive site and building design including response to heritage neighbours, green building features, CPTED considerations and bird-friendly features
- Commitment to ongoing communication with tenants and neighbours throughout the development process to mitigate against potential construction disruptions

### **Replacing Homes for Cars with Homes for People**

The key concept for this infill development is the opportunity presented by relocating a significant amount of the existing surface parking to new underground parking, opening a portion of the site for a new building. Effectively, we are displacing cars to create new homes for people while not impacting or displacing any existing residents: a challenge often difficult to avoid when considering development in an urban context.

### **Current Development**

The property is currently developed with two 13-storey residential rental apartment buildings, known as the Goodacre Towers, owned by Starlight and managed by Devon Properties. Much of the site is also developed with surface parking, providing 183 parking spaces.

### **Concept Planning**

Starlight has engaged a team of planning and design professionals, led by independent Development Manager Mat McLash, to prepare a plan for an infill rental building. The idea of making more efficient use of the site has long been considered for the property, with many earlier development concepts prepared and presented to the community since 2017. The current proposal seeks to achieve an appropriately scaled, sited and contextual plan by incorporating ideas, opportunities, and constraints identified through ongoing community dialogue.

### **Stakeholder and Community Engagement**

Early engagement with the James Bay Neighbourhood Association and City of Victoria planning staff identified key matters of consideration for the site, including:

- Minimize impacts on the traditional residential and heritage-designated neighbours to the south and west;
- Achieve a transition in scale from the 13-storey towers to the single-family residential setting;
- Help 'complete' and activate the Toronto Street frontage by filling in the gap in the streetscape with a new building that can 'knit' the neighbourhood back together;
- Design a new building to be highly street and pedestrian-oriented;
- Provide new rental housing and consider larger family-friendly unit sizes;
- Address parking needs of the existing and proposed new residents without impacting neighbouring on-street parking; and,
- Consider the site's relationship to adjacent open spaces of Beacon Hill Park to avoid potential wildlife impacts.

**Tenants-First Approach.** Before commencing public and community engagement, the team followed a tenants-first approach to ensure existing tenants were informed of the development planning process. A tenant meeting on June 21, 2022, conveyed an introduction to the proposal and assured tenants that their existing homes were not affected by the plans and the infill development would not affect their tenancy: tenants will not be displaced and there will not be any changes to their rent as a result of the development.

**Immediate Neighbours.** Following tenant notification, the team invited immediate neighbours to attend an information session on July 6, 2022, to learn about the planning process and provide input to the plan development. Topics discussed included parking and traffic, building siting and strategies to mitigate construction impacts.

**JBNA - Project Introduction.** An initial presentation of the project was shared with the JBNA at their July 13, 2022 meeting. The team provided an overview of the conceptual planning and received positive feedback about the site planning approach, the building scale and siting, with some noting that the proposal represented an appropriately scaled building in the right place.

**JBNA - DRC Meeting.** The DRC reviewed the project on August 9, 2022, with suggestions for further study of the building's presence at the important intersection of Douglas and Toronto, and the building's materials and landscape details. Further consideration of the unit mix was also suggested to try to incorporate some larger, family-friendly units on the ground floor.

**JBNA – CALUC Community Meeting #1.** Notification of the CALUC Community Meeting was provided in August 2022, inviting interested residents to attend the JBNA's September 14, 2022 Zoom Meeting. The JBNA hosted two CALUC Meetings that evening, and the project at 350-360 Douglas was considered first on the agenda. The project team presented the proposal and received comments and questions from attendees. The proposal was well received, acknowledging the iterative process in

**350-360 Douglas Street**  
Letter to Mayor and Council

preparing the application. Matters for consideration, as also summarized in the JBNA's letter dated September 18, 2022, were raised by a group of immediate neighbours, noting:

- Potential traffic impacts and removal of site access from Toronto Street;
- Potential construction impacts on the existing heritage homes and neighbourhood hydrology (groundwater flow);
- Impacts to tourism;
- Potential impacts to local avian population;
- Inclusion of sustainable building technology; and,
- Property maintenance and good neighbour relations.

The development planning team has met with individuals representing the immediate neighbours and remains committed to ongoing communication throughout the development process.

**City of Victoria Development Tracker – Comment Period #1.** Notification of the first CALUC Community Meeting also directed interested individuals to view the project materials on the City's Development Tracker. Over the course of the 30-day comment period, a total of **14 responses** were submitted. While there were some comments of support (three) in recognition of the need for more housing, matters for consideration from those opposed (nine) and who selected "other" (two), included:

- Potential impacts to birds and wildlife in Beacon Hill Park;
- Loss of parking on site and the impacts on parking on the neighbourhood;
- Change in neighbourhood character with the addition of another building;
- Traffic impacts within the neighbourhood;
- Geotechnical concerns and potential for construction to impact adjacent neighbours; and,
- Impacts on the residents of the existing building on site.

These topics have been studied and considered through the detailed technical and site analysis completed to help shape the proposal.

**JBNA – CALUC Community Meeting #2.** Notification of the CALUC Community Meeting was provided in June 2023, inviting interested residents to attend the JBNA's July 12, 2023, Meeting via Zoom. The project team provided a presentation of the proposal and received comments and questions from those in attendance. The proposal was well received, acknowledging the team's attention to community engagement and accepting input through the pre-application process. Questions and topics of interest, as also summarized in the JBNA's letter July 17, 2023, were noted as follows:

- Mitigation against potential impacts to neighbouring heritage homes;
- Landscaping maintenance and tree removal/replacement;
- Mitigation against impacts to the local avian population in Beacon Hill Park;
- Site access and traffic along Avalon Road with closure of Toronto Street driveways; and,
- Amount of new development in James Bay and consideration of cumulative impacts.

**City of Victoria Development Tracker – Comment Period #2.** Notification of the second CALUC Community Meeting also directed interested individuals to view the project materials on the City's Development Tracker. Over the course of the 30-day comment period, from June 27 – July 26, 2023, a total of **18 responses** were submitted. There were three comments of support in recognition of the need for more housing and support for new housing on the surface parking lot. Matters for consideration from those opposed (15), included:

- Potential construction impacts to adjacent heritage homes;
- Loss of parking and impacts on parking within the neighbourhood;
- Size and scale of building and loss of views and impacts to trees;
- Amount of development occurring in James Bay; and,
- Potential impacts on local avian population in Beacon Hill Park.

These topics have been studied and considered through the detailed technical and site analysis completed to help shape the proposal.

## **Site Analysis**

A comprehensive site analysis was completed to inform the site plan including:

### ***Environmental:***

- consideration of solar orientation and prevailing wind patterns to avoid shadow and wind impacts
- siting to preserve mature, healthy trees where possible and replacement at a meaningful compensation ratio where not possible.

### ***Views:***

- thinking about the orientation of new buildings to maximize views to Beacon Hill Park and South Park Family School yard
- providing a sense of connection to large open spaces and creating critical 'eyes on the street and park'
- considering privacy and overlook concerns with separation from existing residential towers and surrounding neighbours
- siting the new building at an oblique angle to the existing building minimizes direct sightlines
- emphasizing limited window openings along the most proximate side of the existing building to create positive relationships between existing and new structures

### ***Built Form Analysis:***

- considering the siting and setbacks of existing and adjacent buildings to help identify appropriate siting for the new building

### ***Transportation:***

- removing the site access off Toronto Street to create a strong pedestrian streetscape and connecting to existing pedestrian, cyclist, and transit corridors to support alternative modes of transportation
- completing a comprehensive parking study and traffic impact analysis

### ***Geotechnical:***

- investigating the geotechnical site conditions to address questions of groundwater and potential construction impact mitigation strategies to address concerns from adjacent neighbours.

## **Proposed Development**

The proposal is for a new infill purpose built residential rental building located in the north portion of the site, fronting Toronto Street. The building is six storeys in height, stepping down to four storeys in the west, and appearing as five storeys in the east, where the new building will be built into the site's existing slope. The proposal accommodates 90 new rental homes, including 39 one-bedroom, 21 one-bedroom and dens, 26 two-bedroom units and 4 three-bedroom suites.

New underground parking and replacing of some surface parking are proposed to meet the calculated parking demand, based on the detailed parking study prepared by Watt Consulting. The proposal right-sizes the amount of on-site parking, appropriately accommodating parking for existing and new residents, while also responding appropriately to the City's prioritization of active transportation modes. The proposal provides new bicycle parking to support the new building and introduces additional bicycle parking to address the existing shortfall associated with the current buildings. Further, accommodating the parking requirements of the existing residential towers on site with new underground parking allows for a more positive urban design and community result.

## **Respecting the Heritage Context**

The west portion of the site is located within the Avalon-Huntington Heritage Conservation Area. The part of the site assigned to this area does not contain any heritage-designated or registered buildings. A surface parking lot currently occupies it with a carport structure along the western edge. However, the community has a rich history, and the site is adjacent to three heritage-designated houses along Huntington Place. This context has been considered during the development of this proposal. Buildings in the Queen Anne, Edwardian Vernacular Arts & Crafts and Italianate styles define the community. Single-family homes are built and clad in wood, and larger buildings such as the James Bay Inn and South Park Family School are constructed and finished in red brick, stone, and white stucco with metal and concrete projections and details. Consistent with the construction methods and practices of the historical context, the proposed structure has been developed with a material and colour palette that is harmonious with these larger historic structures, given their similarities in scale. The wood cladding and detailing historically used on single-family homes were not typically used on larger structures of the era, so these are avoided to be consistent with the historical methods and prevent an incorrect illustration of the era's architecture.

This approach is consistent with *The Standards and Guidelines for the Conservation of Historic Places in Canada Standard*, which identifies that work should conserve the heritage value and character-defining elements when creating new additions to a historic area or any related new construction. Further work should be made physically and visually compatible with, subordinate to and distinguishable from existing elements. The proposed building's two-storey red brick base and light-coloured upper storeys with dark detailing acknowledge the appearance of the James Bay Inn. However, the application of the materials is such that it is differentiated from the historic buildings. The resulting palette and simple detailing of the proposal create a reserved backdrop to the adjacent single-family homes, allowing the vibrant colours and rich architectural detailing of the historic structures to remain the prominent focus of the neighbourhood.

The character of the historic streetscapes is defined by minor front yard setbacks that are activated with front porches, low metal or wood fences, and attractive landscaping that promotes a sense of community and an active pedestrian street. The proposal seeks to connect to the character of this streetscape. All ground-level units have street-facing patios enclosed with black metal fences and landscape planters.

## **Activating the Street**

Particular attention has been given to the street level of the building to create an active street edge. A two-storey brick base combined with street level patios creates the feeling of a townhouse development and provides residents with direct access from the sidewalk. Terraced planters and landscaping make a soft transition from private to public space. The main lobby is also accessible from both sides of the building, providing a front entrance to the street and a rear entrance from parking and service areas.

The perimeter along Huntington Place and Toronto Street will be upgraded with enhanced landscaping, including new trees and shrubs. This will replace the existing carport to provide a natural screening of the parking area. Black metal fences will be provided where guardrails are needed in a manner that is similar in character to fencing used by several residences in the community.

Where possible and advisable based on tree health, existing mature trees will be retained. A Tree Management Plan has identified trees along Douglas Street that can be retained. Where tree removal is required, replacement planting will be provided.

## **Design and Development Permit Guidelines**

Guidelines and principles of the City of Victoria *Design Guidelines for Multi-Unit Residential Developments* have been implemented in the design of this project. The new building respects the existing community through the placement on site and stepped massing that transitions from the existing

## **350-360 Douglas Street**

### **Letter to Mayor and Council**

13-storey structures to a 4-storey height adjacent to single-family neighbours. Materials also celebrate the residential and heritage context. Careful consideration has been given to how the building fits into the streetscape. Private residential entries, patios, landscaping, and façade articulation have created an active and engaging residential frontage. Recessed balconies divide the horizontal mass of the building into a series of smaller blocks, and material articulation further reduces the massing of the building by creating the perception of stepbacks in the façade. Further variations in the façade accentuate the corners of the building.

All sides of the new building have been designed to focus on the interaction at the ground level with rich, durable, and quality materials and treatments used throughout the project. This results in a pedestrian-oriented experience throughout the site with no visible “back-of-house.” Two public entrances are provided: one facing Toronto Street and one facing south towards the parking and drop-off area. Loading and garbage areas have been placed away from the street and are integrated into the design.

All residential units are provided with balconies or patios, typically recessed into the façade for privacy. In addition, several other outdoor amenities are provided, including two rooftop patios with planting. At ground level, the north side of the building is primarily activated with private patios facing the street to contribute to the community’s residential character. On the south side, shared patios are provided adjacent to the fitness room. This sheltered location has excellent solar exposure in the afternoon and evening and is an opportunity for outdoor fitness activities or community gatherings.

Being mindful of resident and migratory bird populations that inhabit the adjacent parkland, the development implements several bird friendly design features as suggested in the Bird Friendly guidelines of the City’s Design Guidelines for Multi-Unit Residential developments. The primary impact buildings have on birds is injury or death from a collision with glass. The proposed design uses proven strategies to mitigate this impact including reducing windows to well below 40% of the total building façade area, and the avoidance of mirrored and highly reflective glass. Freestanding glass surfaces such as balcony railings and dividers will be frosted to avoid fly through conditions. Other building conditions such as vents, grates, and pipes will be designed in accordance with best practices to ensure birds to not become trapped by these elements. Additionally, full cut-off site lighting fixtures will be used to maintain visibility of natural navigation cues. This will be a notable improvement over existing site lighting strategies.

### **Crime Prevention Through Environmental Design (“CPTED”)**

Methods have been integrated into the design to enhance the safety of the property and adjacent public streets. The placement of the building creates an active frontage that encourages natural surveillance of the street by residents from windows and private patios and balconies. Lighting, landscaping, grade separations, pavement treatment, and decorative railings are used in a manner that defines private defensible space but maintains visual connections to the street and public realm. Lighting and building canopies are used to create an integrated approach to wayfinding, guiding users to public entrances through well-defined pedestrian walkways. Quality damage-resistant materials are used to ensure the building and property appear well maintained and promote a continued feeling of pride and ownership in the community.

### **Green Building Features**

The concept for this development has been guided by green building principles, with these drivers helping to shape the building form. The existing buildings will be maintained, continuing to capitalize on these structures’ embodied energy and carbon. The new structure is placed on the site in a way that optimizes solar exposure for new residents while not creating a shadow impact on existing residents of the property and adjacent neighbours. The form also responds to prevailing winds, allowing for natural ventilation and reducing obstructions to natural wind patterns that can create uncomfortable outdoor spaces. This encourages residents to use operable windows and enjoy patios and balconies for passive cooling.

## **350-360 Douglas Street**

### **Letter to Mayor and Council**

The placement of the building has removed many asphalt surface parking stalls, resulting in an increase in green space and a more permeable approach to the site, which then reduces the overall urban heat island effect. New parking stalls have been designed with low-ground cover planting at the end that reduces runoff. A parking demand analysis was done to ensure the new parking provisions are right-sized for immediate and anticipated needs of the site. All parking stalls will be roughed-in for EV charging stations to facilitate the shift away from gasoline vehicles. Alternative modes of transportation are encouraged through new bike facilities for both the new and existing buildings.

The green space on the site preserves some of the existing mature trees where possible and enhances the street by adding new trees and other native species. These are selected to minimize dependence on irrigation and to provide a habitat for pollinators that support the local ecosystem.

Step 3 of the BC Step Code will be achieved with this development. Energy usage will be reduced through a robust building envelope, efficient mechanical systems, and LED lighting. The building will also be ready for future photo-voltaic panel installation.

The building will be wood construction, resulting in a lower carbon footprint over other building materials and creating a carbon storage. Additional materials will also be examined for carbon impact, local availability, and impact on the indoor environment while being guided by several FitWel strategies. Different strategies, such as low-flow plumbing fixtures and cut-off site lighting fixtures, will also be used on the site.

### **Amenities**

An internal pedestrian connection is created through the site from Huntington Place to Douglas Street. Running along the south side of the proposed building, it connects to the building lobby and to several resident amenities located at grade, including a dog wash, fitness facility, and bike room. The exterior space between the proposed building and the existing tower is conceived as a passive amenity space. This may include planting, visitor bike parking, seating, and public art to enhance the façade of the existing building.

Residents of the new building will have access to two new rooftop patios. One will be located on the west end of the building above the fourth floor as the building height steps down. This will be set back from the parapet of the building to restrict sightlines and prevent overlooks to adjacent properties. The second will be located on the roof at the east end of the building with views towards Beacon Hill Park. This will be accessible from a social room on the sixth floor.

### **Alignment With City Policy**

The property is designated within the City of Victoria's OCP for Urban Residential development, which accommodates buildings up to six-storeys in height and up to a density of 2.0 FSR. While the existing 13-storey towers are inconsistent with the OCP's anticipated built form, the proposed new building has been designed to reflect City policy and serve as a transition from the existing towers to the surrounding community context.

The proposal anticipates a comprehensive development zone that divides the site into two development areas:

#### **Development Area A (New Development):**

Site Area: 43,390 sf (4,031 sm)  
Building Area: 83,200 sf (7,730 sm)  
FSR: 1.92  
Height: 6 Storey

**Development Area B (Existing Development):**

Site Area: 52,765 sf (4,902 sm)  
Building Area: 155,882 sf (14,482 sm)  
FSR: 2.95  
Height: 13 Storey

The proposed infill building has been specifically sited and designed to be consistent with the intent of the current OCP designation, which allows buildings up to six-storeys in height and up to 2.0 FSR. At 1.92 FSR, the new six-storey infill building in Development Area A is on target with OCP directions. The proposal adds 90 new secured rental homes and once added to the existing 197 units, the site at build-out accommodates a total of 287 rental homes.

Retaining important existing rental housing and creating new purpose-built rental housing without displacing existing homes or tenants is a hallmark of this project.

**Parking and Traffic**

Parking is a vital component of the application. Currently, the site accommodates 183 vehicle parking spaces at grade, representing a parking ratio of 0.93 spaces/unit. Removing existing surface parking is the key that unlocks the site's potential and opens land for more efficient use, providing homes for people instead of homes for cars.

The proposal includes 228 vehicle parking spaces, representing a ratio of 0.79 spaces/unit, and balances the cost of replacing surface parking with new underground parking and accommodating the calculated parking demand. Watt Consulting was engaged early in the conceptual planning to prepare a Parking Study to calculate the parking demand. Based on an analysis of comparable sites, Watt calculated the parking demand at build-out with 287 rental homes to be 235 vehicle parking spaces (206 residential and 29 visitor parking spaces).

This means that the expected parking demand is exceeding the proposed parking supply by 7 vehicle parking spaces.

However, a program of Transportation Demand Management (TDM) strategies is proposed to help offset parking demand and to encourage a mode shift toward walking, cycling and transit use.

Notably, the proposal is investing in new bicycle parking to address a current deficit in on-site bicycle parking. Residents of the existing towers have access to 26 short-term bicycle parking racks and no long-term bicycle parking. The proposal introduces new bicycle parking to support the existing and new units, with 44 short-term bicycle parking spaces (29 required) and 189 long-term bicycle parking spaces, including 122 new long-term bicycle parking spaces provided for the new development (103 required). The proposal also includes a bike wash and bike repair station, which reduces the resident parking demand by 6 vehicle parking stalls. This means the expected parking demand is exceeding the proposed parking supply by only 1 vehicle parking space.

Starlight is discussing with stakeholders interim parking measures to best manage the parking supply during the project's construction phase. Options under consideration include incentives to reduce parking demand as vacancies occur to support new tenants without vehicles and explore nearby off-site parking that could be secured and supported by a shuttle program to minimize inconvenience to existing tenants. While recognizing the challenges of infill construction, we can find solutions to manage the interim condition and underscore the unique opportunity this proposal offers in not displacing any existing homes or tenants to achieve the net increase of ninety new rental homes.

## **Community Benefits**

The project offers several community benefits, most notably the creation of much-needed new rental housing in these challenging times of low supply and high demand. We are encouraged by the positive comments of support heard so far about how the proposal reflects an appropriate and well-designed solution that makes more efficient use of an existing site and provides a positive community outcome.

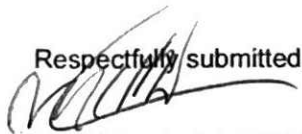
- Creation of 90 new purpose-built rental homes, including ground-oriented homes;
- Replacement of surface parking with a new building that helps 'knit' the neighbourhood back together;
- Streetscape activation and enhancements along Toronto Street and Douglas Street to support greater walkability;
- Visual connections to Beacon Hill Park and South Park Family School yard to provide 'eyes on the park' and a stronger sense of community;
- Respectful transition in scale from existing towers to a traditional neighbourhood setting.

As noted, we have been exploring the development of additional infill rental housing on this property with the community since 2017. Over this time, the housing crisis has continued to escalate, and all stakeholders have, in response, been working to offer incremental solutions through new development proposals, emerging policy directions and expanded community awareness of the challenges affecting all sectors of the housing spectrum. More supply is needed and we hope this proposal can be supported to bring forward new rental housing in this unique and appropriate location.

The development process related to the 350-360 Douglas Street application was initiated many years ago, and before the recently amended Inclusionary Housing and Community Amenity Policy. Under the 2019 policy, purpose-built rental housing developments were exempt from providing further community amenity contributions, recognizing the need for more rental housing supply. The policy has recently been amended. As proposed, the development does not include a component of affordable housing consistent with the policy in effect at the time of the original consultation. Being next to Beacon Hill Park, and set within the highly desirable and walkable neighbourhood context, the site is uniquely positioned to help achieve the objectives of a "15-minute city" to support even greater sustainability and resiliency against the rising climate crisis with a more thoughtful, diverse, innovative, and compact development.

We look forward to engaging with the community, staff and Council to advance a development concept that balances the need to provide for a mix of housing, and opportunity to activate the townhouse style pedestrian-scaled frontages as proposed.

Respectfully submitted,



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