

November 20, 2025

City of Victoria

1 Centennial Square
Victoria, BC V8W 1P6

Attention: Mayor and Council

Re: 1101 Yates Street Mixed-Use Development Proposal: Application for Rezoning and Development Permit

We're pleased to submit this letter and accompanying documents in support of the rezoning and development permit application for the property located at 1101 Yates Street (the "Property"), a one acre commercial parcel bounded by Yates, Cook and View Streets, and located at the transition between the downtown and Fernwood neighbourhoods (the "Development Proposal" or "Project"). For many years, the Property has been home to a succession of car dealerships. Jawl YC Holdings Ltd, an affiliate of Jawl Development Corporation (the "Applicant"), purchased the land in May of 2022. In June 2024, the Applicant formed a partnership with the BC General Employees' Union and its affiliated non-profit housing organization, Affordable BC Housing Society, to jointly advance a mixed-use redevelopment of the Property to its highest and best use for this key urban location.

The following rationale outlines key aspects of the development proposal, its alignment with municipal policy, neighbourhood fit, sustainability features and contributions to the public realm.

***Proposal
Overview***

At the intersection of Fernwood's southwestern edge and the downtown core, the Development Proposal will bring a balance of commercial and residential uses including ground floor retail / restaurant use, licensed childcare, purpose-built conference and commercial office spaces and 175 rental homes. The Project is composed as a complex of two buildings over a shared underground parkade. The East Building (6 storeys) is located on View Street and the West Building (19 storeys + mechanical penthouse) is located on the Cook Street block end.

Our informative guiding principles for the formulation of the Development Proposal include:

- The Project should incorporate an architecture which is contextually appropriate while also befitting the prominence of this gateway location into the downtown core.
- The Project design should support an activated and pedestrian-friendly public realm on all three street frontages.
- The Project should work within the spirit of the Official Community Plan and applicable design guidelines.
- The Project should be respectful to the adjacent established residential neighbourhood and form a massing transition between downtown and lower-density Fernwood.

- The Project should incorporate responses to the prevailing community need for licensed childcare capacity and rental housing inventory which incorporates family sized units and meaningful below market and accessible components.
- The Project should deliver best in class office and meeting premises for the use of the BC General Employees' Union staff and members which builds upon quality standards established by the Applicant at the Atrium, 1515 Douglas Street and Capital Park and which anticipates post pandemic occupant priorities.
- The Project should incorporate leading systems and design approaches to optimize energy efficiency, resilience and livability.
- The Project should achieve a high design standard in terms of material durability, visual interest and human scale, while incorporating efficiencies to optimize quality and affordability to ensure overall viability of the Project.



Official Community Plan Urban Structure Diagram

Policy Context The Official Community Plan (OCP) locates the site on the Eastern edge of the downtown core a transition area within which policy anticipates building heights of up to 15 storeys and development densities up to a floor space ratio of 3:1. To contribute to a positive urban transition at the edge of downtown, the Project makes a height transition within the site boundaries, with a 19-storey building on Cook Street and a 6-storey mid-rise to the East, on View Street. The building heights have been carefully calibrated to balance building program requirements with the provision of on-site open space, generous setbacks that shape comfortable street frontages and relationships to neighbouring buildings and facilitate essential construction efficiencies. The proposed overall floor space ratio is **4.8:1**.

The increase in the permitted height and density is requested in light of the range of community benefits and strategic policy objectives that will be advanced by the Proposal (as outlined in the following sections).

The Applicant's team has engaged with City staff throughout the pre-application and technical review stages, working collaboratively to align the Proposal with policy objectives and Municipal requirements while balancing viability parameters. This

resubmission package incorporates design adjustments in response to City feedback, specifically to the site design and building massing. The proposed mix of uses - commercial and residential - supports City objectives for housing and reinforces the urban core as the primary regional employment centre.



Aerial sketch view of the Development Proposal, illustrating the transition in building height and scale between the downtown core and Fernwood neighbourhood.

***Need and
Demand,
Benefits and
Amenities***

The Project will make a significant positive contribution to the City through support of the following:

Housing Supply and Diversity: 175 secured rental homes including 20% of suites at below-market rental rates (CMHC Median Market Rates) and 20% fully accessible homes. The inclusive unit mix provides highly livable suites for individuals and families (30% 2-BDR, 19% 3-BDR). Suite layouts are efficient yet generously sized for livability. All suites have private balconies, and the West Building hosts shared indoor amenity spaces and a landscaped amenity roof deck. The Affordable BC Housing Society, a non-profit housing provider, is intended to be the long-term owner and operator of the rental homes.

Employment Use: The purpose-built meeting facility and commercial office spaces are a vote of confidence in Victoria as the centre for employment use in the CRD. They are being built to suit for the BC General Employees' Union, a top-quality employer who is expanding their Victoria office footprint, enhancing its meeting spaces for its members and re-locating to Victoria's core from an existing suburban location.

Licensed Childcare: Located at the ground floor of the East Building, the space will provide approximately 12 spaces for infants and toddlers and 25 spaces for 3-5 year old children, with a particular focus on design and supports for neurodiverse children. The landscaped open space fronting onto View Street functions as the entrance court for the

families and the licensed outdoor play area. The Development Proposal includes commitment to a 25 year secure tenure for childcare use.

High-Quality Architecture: The buildings and outdoor spaces are designed to prioritize material quality, durability and active street frontages. The architectural expression is based on contextually integrated building forms, visual interest and human scale. The architectural and landscape architectural design received positive endorsement by the Advisory Design Panel.

Sustainability: The Project is being delivered via an Integrated Design Process that included an early multi-disciplinary sustainability workshop. The Project has been designed to achieve Emissions Level 4 of the Zero Carbon Step Code, and the project exceeds municipal requirements by targeting Step 3 of the BC Energy Step Code for both buildings. Another key aspect is landscape-based stormwater management for both on-site run-off and, where possible, road-way run-off.

Active Transportation: The Project locates higher density mixed-use occupation immediately adjacent to the downtown core, the future Yates Street AAA cycling path and the Yates Street frequent transit priority corridor. Mode shift to alternate transportation is further encouraged through the provision of enhanced secure bike parking and end-of-trip facilities for office workers.

Public Realm: Careful attention has been paid to all three street frontages, integrating the building frontages with paving, landscaping and street furniture to create a welcoming and comfortable pedestrian environment. Generous boulevards are proposed on all street frontages, providing safe and shaded sidewalks. The frontage designs incorporate the Downtown Public Realm Plan standards, with emphasis on street corners that include public furnishings, specialty paving and bike racks to enhance the pedestrian experience.



Site Plan: Yates Street is the address and front door to the meeting facility and upper floor offices. The West Residential entrance is located mid-block on Cook Street, and at the corner of Cook and View Streets is a café with patio. Along View Street, there will be the entrance to underground parking and services, the childcare outdoor play area and entrances to the East building (licensed child care and the residential lobby).



The three-storey commercial podium continues the human scaled frontage along Cook Street. At the Cook & View Streets corner, the public realm is activated by a corner café and tiers of landscaped roof decks above.

**Neighbourhood
Impacts,
Safety and
Security**

The Project will have a positive impact on Fernwood residents by addressing multiple key neighbourhood objectives:

- Adding needed rental housing including below-market, accessible and family-friendly homes;
- Providing an enhanced and accessible pedestrian frontage around all three street edges;
- Incorporating green space into the public realm, including preservation of the Cook Street Horse Chestnut trees;
- Providing well-located licensed childcare space on View Street with carefully considered space for drop-offs and pick-ups;
- Neighbourhood placemaking and activation by a café and sidewalk patio at the corner of View and Cook Streets;
- Locating a complimentary mix of commercial and residential uses to establish 24 / 7 occupation on site;
- Remediation of a brownfield car dealership site and conversion to more active, community supportive use;
- Facilitation of natural surveillance with extensive transparent windows at ground level facing adjacent sidewalks and streets; and
- Entrance locations that are easily identifiable from the street level and designed for clear sight lines and night-time visibility.

The Development Proposal was introduced informally to the Fernwood Community Association (FCA) on May 20, 2025, followed by the formal presentation July 15, 2025. We understand members of the Downtown Residents Association were invited to the July 15th meeting by FCA representatives. At the meeting there was fulsome discussion about the positive aspects of the proposed development program, amenities and design, along with concerns about the building height of the West Building, construction activity in the neighbourhood and traffic impacts. The rationale for the building height was discussed in context of the positive relationship to increased open space, narrowed shading profile, and optimized housing livability and efficiency. This

resubmission responds directionally to community comments regarding building height, with the West Building reduced to 19 storeys.

In terms of neighbourhood level construction impacts, we recognize the surrounding area is undergoing intense and prolonged transformation and the Applicant is committed to maintaining clear communication with the neighbourhood and adhering to bylaws and best practices throughout the Project's construction process.



The commercial office entrance defines the landscaped plaza at the corner of Yates and Cook Streets.

**Design and
Development
Permit
Guidelines**

Located on the edge of downtown, the property transitions between the Residential Mixed-Use District, outlined in the Downtown Core Area Plan, and the Urban Residential neighbourhood that is governed by the General Urban Design Guidelines (2022). The Project addresses the full range of placemaking, urban design and livability objectives shared by these guidelines including:

- Providing comfortably scaled street walls on all three frontages to create a positive sense of enclosure;
- Designing ground floor glazing, planters and paving to clearly define entrances and to activate the public sidewalk;
- Locating and shaping buildings to optimize sunlight access, livability and privacy;
- Creating a transition in building height from West down to the East, to stabilize the edge of the downtown core and harmonize with the lower-density Fernwood neighbourhood;
- Stepping the West Building's podium down to three storeys at the corner of Cook and View Streets, to establish a sympathetic street wall height adjacent to the Fort Street heritage conservation area;
- Creating street interfaces appropriate to the internal uses and neighbourhood scale, through the thoughtful placement of glazing, building overhangs and landscaped planters;
- Clearly articulating the massing of the West Building's podium, tower and top, while maintaining a cohesive architectural expression;
- Shaping the West Building tower to align with true North, which visually reduces the tower massing and narrows its shadow impacts;

- Enhancing livability by bringing natural light and views into all residential lobbies. On the West Building, this is achieved by a dramatic vertical recess in the tower façade; and
- Incorporating materials, texture and glazing detailing to articulate the building facades, establishing human scale and visual interest.



Boulevard landscaping and covered bike parking shape a welcoming and functional childcare arrival space. The proposed in-bound sidewalk would be secured as a volumetric Statutory Right-of-Way for public pedestrian access on property and over the underground parkade structure.

Transportation The Project’s underground structure includes vehicle and bike parking for the use of residents, commercial occupants and visitors, summarized as follows:

Vehicle Parking:

- Commercial & Visitor: 85
- Residential: 107

Bicycle Parking:

- Visitor bike racks: 52
- Commercial Secure Storage: 24
- Residential Secure Storage: 237

The requested reduction in vehicle parking is 18% or 41 stalls. Per the included Parking Study prepared by Watt Consulting Group, the proposed supply is appropriate and adequate for the Project’s intended uses. To further manage Project parking demand, the Proposal includes parking sharing between compatible uses and enhanced bike parking. Please refer to the included Parking Study for a detailed outline of the anticipated parking demand and confirmation of the adequacy of the parking proposal outlined herein.

Please note three levels of underground structure are proposed, in consideration of the following:

- On-site geotechnical investigation and preliminary structural analysis indicate three storeys of excavation will be required to reach bedrock on portions of the Property, which is required for the building's seismic design;
- Underground floor area is needed for support functions such as building services, residential unit storage and secure bike parking;
- The building will be the BCGEU regional headquarters for meetings and events, drawing attendees and their associated vehicle parking requirements. The Applicant is committed to responsible accommodation of the project's parking requirements on site, and to mitigating increased pressure on neighbourhood street parking.

Alternative modes of transportation will be encouraged through the following:

- Proximity to the Yates Street frequent transit priority corridor;
- Provision of cargo-sized, covered bike parking for the childcare;
- Well-located, covered visitor bike parking at commercial and residential building entrances;
- Integration of Transportation Demand Measures to encourage alternate modes of transportation, including an increased supply of secure bike parking for residents (10% above bylaw requirements), secure storage for cargo bikes, e-bike infrastructure for 50% of the secure bike stalls and bike maintenance stations.

Around the site perimeter, access will be supported through careful positioning of on-street loading and parking spaces. The main loading space will be located on View Street, adjacent to the Cook Street corner and the West Tower. The space is sized to accommodate larger vehicles for deliveries, moving vehicles and waste management (the staging area for waste bins is on Property, adjacent to this loading space and the underground parking access). Truck manoeuvring access to this space is outlined in the accompanying On-Street Loading Review prepared by Watt Consulting Group. A secondary loading space is proposed on Yates Street, adjacent to the West Tower office entrance, and designed for smaller vehicle deliveries and pick-up / drop-offs. The details of this loading space will be designed in coordination with the City of Victoria's Yates Street frontage design.

***Climate-
Forward
Building
Features***

The Applicant and design team are committed to sustainable building principles, that are foundational to the Project's design and have been considered in terms of the long-term operations. Climate responsive approaches are prioritized for their inherent environmental benefits as well as enhanced livability and operational efficiencies. These include:

- Redevelopment of an underutilized urban site in an area that is well served by streets, public transit and highly accessible by pedestrians and cyclists.
- Treatment of roadway and sidewalk rainwater in landscaped bioswales (rain gardens) around much of the site's perimeter.
- Treatment of roof rainwater in landscaped rain gardens that double as engaging natural play areas for the daycare.
- Enhanced bicycle storage for all building occupants, including charging infrastructure, cargo-bike sized stalls and bike maintenance stations.
- Shower and changing facilities for commercial office occupants to encourage active lifestyles and commuter mode shifts.
- A high-performance building envelope of durable materials.

- Proposed and retained boulevard trees to shade the sidewalk and outdoor areas.
- Extensive landscaped roof areas to reduce the urban heat island effect and stormwater run-off.
- Inclusion of native plants and pollinator plants to enhance urban biodiversity.
- High performance HVAC systems.
- Water efficient plumbing fixtures.
- Energy efficient lighting and electrical systems.



The View Street frontage integrates pedestrian, bike and vehicle access within a network of landscaped open spaces.

Urban Forestry The project is committed to protecting and enhancing the urban forest, and will be using the following strategies to meet the City of Victoria Tree Bylaw and lot minimum requirements:

- Protection of the existing horse chestnut trees on Cook Street.
- Setback of the building parkade and surface treatments to allow the retention of a large off-site Austrian Pine tree.
- Street frontage design that allows for large boulevard trees on Yates and View Streets.
- Deep and extensive soils over ground level parkade areas, to allow for a range of tree sizes on site.
- Large raised planters on the level four rooftop to allow for many small trees to grow with adequate soil volumes.

Infrastructure Integration of the Development Proposal with existing site infrastructure is a complex undertaking that has been considered from the early stages of the Project's planning and design. The engineering and architectural design team has consulted extensively with City of Victoria staff to review coordination of City infrastructure with the proposed

services, traffic, storm water management and right-of-way improvements planned in connection with the Project. The Property has moderate grade changes along its boundaries and the design will meet existing grades on the three street frontages. The design team has initiated coordination with all utility companies with services adjacent to the site to review existing infrastructure and address conflicts with proposed right-of-way improvements. At present, the site is well serviced on all three frontages, and new utilities connections are planned to occur on Cook Street (water, storm and sewer) and Yates Street (electrical and communications). In general, the Development Proposal will employ sustainability objectives that will minimize the servicing impact of this project on City of Victoria systems.



The frontages incorporate landscaping, seating walls and building overhangs into a comfortable, human-scaled public realm.

In conclusion, the Project contemplated by this application presents a significant opportunity to bring much needed rental housing, office and childcare uses to an important urban location. Our team has proceeded thoughtfully at each stage of the design process conducted to date and believe that this Project aligns with key City of Victoria and community objectives. We look forward to working with City staff in connection with this application in the months ahead and are available as necessary to answer any questions or furnish additional information.

Sincerely,

Jawl Development Corporation

A handwritten signature in blue ink, appearing to read 'RJawl'.

Per: Robert Jawl