

Thursday, March 7, 2024

City of Victoria  
1 Centennial Square  
Victoria, BC V8W 1P6

**Attn: Planning Department**



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**Re: 1320 Purcell  
Response to TRG Comments**

The following comment - response list is provided to assist with review of the plans resubmitted 24-03-19.

Please advise if there are any questions regarding the responses provided.

Sincerely,

dHKarchitects

A handwritten signature in blue ink, appearing to read 'Charles Kierulf', is written over the printed name.

Charles Kierulf architect AIBC MRAIC  
Principal



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| Comment   | Response    |
|---|-------------|
| 1 <i>The property is designated Traditional Residential, which supports ground oriented residential development up to 3 storeys and density up to 1:1.1 FSR. The Rockland Plan encourages maintaining large lot character through sensitive infill that preserves green space and significant site features.</i>  | Understood. |
| 2 <i>Heritage conserving infill" (HCI) is a use defined as one or more residential buildings on a lot with a heritage designated building or an addition to a heritage designated building that results in one or more dwelling units being added to the lot. The proposed four-unit houseplex would be considered an HCI use under the Missing Middle Regulations, subject to proceeding with designation of the heritage building (refer below to heritage comments).</i> | Understood. |



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| <p>3 <i>The width of the heritage conversion presents a challenge in terms of limited lot width remaining for a new building. Please consider proposing a three-unit houseplex with a smaller footprint or an addition to the heritage building. An addition to the heritage building would potentially lessen the impact on the significant and only bylaw protected tree onsite and avoid the need for limiting glazing as is currently proposed. Alternatively, if proceeding with the current proposal, please revise the proposal to address inconsistency with the design guidelines, as outlined below through design and heritage comments.</i></p> | <p>For a number of reasons, we prefer the existing proposal. Among them, an addition to the existing Character home would dramatically affect the people currently living in the building, including evictions. We are extremely reluctant to force any current tenant to move out. It would also have an impact on the character of the existing heritage home. Typically, we prefer not to dramatically impact heritage exteriors. The limited glazing is to protect the privacy of our neighbour to the east and those tenants currently residing in the existing Character home. It is unlikely a smaller footprint or addition would lead to significantly greater glazing on the east or west elevations.</p> |
| <p>4 <i>An applicant who has paid the base application fee pertaining to a proposed development in Development Permit Area 15F: Missing Middle Housing and complied with the applicable provisions of the City's Tenant Assistance Policy and a Tenant Assistance Plan consistent with such Policy is entitled to a refund of \$5000 of that fee after the City has issued an occupancy permit for the development. If you have questions, please contact Housing Planners at <a href="mailto:housing@victoria.ca">housing@victoria.ca</a>.</i></p>   | <p>Understood</p>   |



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| <p>5 <i>NOTE: The Plan Check for the proposal has significant outstanding issues and information, including floor area, FSR, height, coverage, open space, electric bike parking, details of accessory building built with no permit history.</i></p> <p><i>Please ensure that your resubmission addresses these items. If you need clarification on any of the items contained in the Plan Check, please contact the Zoning Administration staff as noted on the Plan Check.</i></p>  | <p>These items are addressed in the revised submission.</p>  |
| <p>6 <i>Please provide an updated letter to Mayor and Council providing relevant details on the proposal, which should outline specific aspects of the proposal to demonstrate consistency with applicable design guidelines and provide rationale for required variances. In addition, the required revisions outlined below will likely result in revisions to the letter.</i></p>   | <p>These items are addressed in the revised submission.</p>  |
| <p>7 <i>A Development Permit in accordance with DPA 15F: Missing Middle Housing is required, please refer to the applicable guidelines. Revisions are encouraged to achieve greater consistency with these guidelines, with specific attention to the following objectives:</i></p> <ul style="list-style-type: none"><li><i>o Maintain the pattern of landscaped front and back yards</i></li><li><i>o Orient at least one main entrance to face to the street, with architectural details emphasizing the entrance</i></li></ul> | <p>The south unit on the main floor is oriented towards the street. By design, the living areas are heavily glazed and face the street. The deck is on the street side, further emphasizing the orientation of the building to the street. The intention has certainly been to animate the street and connect the home to the community. The same goes for the upper unit on the south side.</p> |



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| 8  | <i>Sensitively integrate parking to minimize impacts on public and ensure that front and rear yards are not dominated by parking.</i>   | Refer to resubmission for revised parking and rear-yard design.   |
| 9  | <i>include contiguous landscaped amenity space that is usable for each unit.</i>  | Refer to resubmission for revised site plan and amenity space for ground-floor units. Upper units have balconies.   |
| 10 | <i>Staff assessment is that an addition to the existing home could address design concerns and assist to lessen the likely impact on the horse chestnut tree; however, reduction to a smaller houseplex may also be a supportable alternative. Alternatively, please consider reduced parking to avoid new front yard parking and maneuvering. Staff are willing to support a reduced front yard setback to provide for a usable rear yard.</i> | We have moved the building forward in order to provide a more usable rear yard.   |
| 11 | <i>Please consider how the proposal can be revised to orient more entrances toward the public street. In addition, reorienting the entrances will allow opportunities to reduce the need for hard surface walkways and create more space for landscaping and amenity space. Priority should be placed on removing the proposed walkway to the Unit 3 and Unit 4 to avoid impacts on the tree to be retained.</i>                                | <p>Entrances have been relocated to the west side eliminating the access and hardscape along the east side the building.</p> <p>Orienting the entrances to the south significantly impacts the layout and useable living space of the south facing units. Narrow lot infill developments typically have side entrances to allow for maximum interior width in living and sleeping spaces.</p> |



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| 12 <i>Please provide a landscape plan, in accordance with requirements outlined in the application form, which should include a detailed planting list, proposed and retained trees and landscape features.</i>   | Landscape Architect will be engaged for design as the project proceeds.  |
| 13 <i>Staff support the proposal to designate the heritage-registered building, please proceed to apply for heritage designation, which will require a Statement of Significance and consider improvements to the heritage building to strengthen the application. Additional information can be found here: <a href="#">Heritage   Victoria</a>.</i>   | Designation will be considered as the application progresses. A Statement of Significance is not contemplated.   |
| 14 <i>Although a contemporary design which does not attempt to mimic the heritage building is supported generally, the building design should compliment the existing conversion. Please consider revising the material palette to substitute a more appropriate exterior material for the proposed metal. The inclusion of wood is recommended for the doors, soffit and under the balcony, which will acknowledge the heritage building and compliment the heritage building.</i> | Material palette and colour selections include wood doors and soffits and colours have been selected from the colour palette on the existing building. |
| 15 <i>Please consider adding additional colour that will compliment the trim on the heritage building.</i>  | See above.   |
| 16 <i>Please consider revisions to avoid blank walls for the proposed new building, including windows, trim and architectural features to add visual interest and improve livability of the proposed units.</i>   | East and west elevations have limited openings for Code compliance and to limit the overlook and maintain privacy to adjacent residences.              |



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| 17 <i>To be more in keeping with the established streetscape and character, please relocate at least one main entrance to the front elevation to appropriately orient the development toward the street.</i>  | See comments above - orienting entrances to the street has a detrimental impact on liveability of the units.  |
| 18 <i>Please consider adding building articulation through design elements (colour variation, trim, materiality), incorporating both horizontal and vertical proportions Refer to the Standards and Guidelines for the Conservation of Historic Places</i>  | Building design, articulation, materials, and proportions are non-derivative and intentionally not mimicking the more traditional house detailing of the existing building in order to have a clear contrast between the old and the new, in alignment with Standards and Guidelines recommendations. |
| 19 <i>The proposal to provide rental housing is supported, it is requested that existing and new rental units be secured by legal agreement. As this is considered a priority OCP objective, please confirm the provision of new and existing rental units in the letter to Mayor and Council and clarify if you are willing to secure the units as rentals either in perpetuity, or for 60 years or the life of the buildings.</i> | The existing building has been a rental for decades and the new building is proposed to add rental units under the new guidelines for infill developments. Legal agreements are not required to maintain these as rental units and add cost to the development.                                       |



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| 20 <i>Letters of Engagement (Client-Engineer agreements): Please provide to the City letters of engagement (or Client-Engineer) agreement for all disciplines involved in works within the right-of-way. This should include (at minimum) the Civil Engineering consultant, Landscape consultant, Electrical consultant and others as necessary. The consultants engaged should provide a letter (agreement) which fully outlines their scope of engagement, and may also include items for which they are not engaged. The developer is responsible to ensuring that the consultants provide this concurrent with the resubmission.</i> | Letters of Engagement will be provided as the project proceeds through design development toward a Building Permit Application.  |
| 21 <i>Please provide a conceptual servicing/civil plan for review.</i>   | Civil Engineer will be engaged for design as the project proceeds.   |
| 22 <i>It is recommended that, as a condition of development permit approval, and secured in a legal agreement which is registered prior to development permit approval: 3.9m road dedication along full frontage</i>   | Whether 3.9m or 1.4m or 2.47m as have all been successively proposed by Staff, a Road Dedication on a short, dead-end street seems unnecessary and has a significant disproportionate impact on the property. Applicant is not willing to provide road dedication. |
| 23 <i>All TDM measures as requested by the Transportation Department to the satisfaction of the Director of Engineering</i>  | Understood.  |
| 24 <i>Storm drain main installation (if required).</i>   | Storm water will be managed on-site. Civil Engineer to design. Preliminary calculations indicate on site treatment is feasible.  |





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| 25 <i>The applicant is financially responsible for frontage works to the centreline of the road to current City of Victoria standards (i.e., at the time of Building Permit), as per the Victoria Subdivision and Development Servicing Bylaw, and to the satisfaction of the Director of Engineering and Public Works.</i>   | Understood.                   |
| 26 <i>The Civil designer must show all existing survey monuments on all plan submissions (including 3rd party design / utility submissions) and is to note those monuments that will be impacted by the development and associated works. Any monument located within 0.5m of an area of works is to be considered destroyed. As per Bylaw 22-028; the City will charge the developer \$2,000 per impacted monument as a fee at the time of Building Permit (non-refundable). Please ensure that the Civil submission drawings include existing monument locations.</i> | Understood.                   |
| 27 <i>The standard right-of-way for a local street is 18.0m. To help achieve this, a dedication of 3.9 m is required as a condition of development permit approval. Please indicate the area to be dedicated on the submitted plan.</i>   | Refer to commentary above #22 |



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| <p>28 Staff do not support the proposed parking layout as shown in the submitted plans, which would require a variance. Purcell Place is a designated greenway, with deficient pedestrian facilities. Staff will recommend that frontage works including a 1.8m curbside sidewalk and 2.9m tree'd boulevard be installed as a condition of rezoning. Staff suggest the applicant explore options for 2 vehicle parking spaces perpendicular to the Public Right of Way, including 1 accessible parking stall, accessed via a driveway and crossing compliant with the Highways Access Bylaw. A plan revision is required.</p> | <p>We have amended the parking to provide perpendicular stalls off the Public ROW with a standard crossing design for the driveway access.</p> <p>Requested clarifications were not provided so we have made assumptions regarding the layout of the two stalls.</p> |
| <p>29 Please illustrate a crossing in compliance with the Highway Access Bylaw for both the existing and proposed driveways. Each crossing should be a minimum 3.5m wide, maximum 4.5m wide Type A crossing with 1.5m flares. To promote pedestrian safety and visibility for motorists when entering and leaving the right of way a 3.0m x 3.0m site triangle is required on each side of the driveway crossings. A site triangle is located within the lot. Please see Schedule C of the Highway Access Bylaw for additional information. A plan revision is required.</p>  | <p>Standard crossing is indicated on the revised submission.</p> <p>No changes are proposed at the existing driveway crossing.</p>   |
| <p>30 Long term bicycle parking is shown as being located within the basement of the existing building. Further information is required regarding the height of the existing basement, and access arrangements to the proposed long term bicycle storage, to confirm that it complies with Schedule C requirements. A plan revision is required.</p>  | <p>Information provided on the revised submission. The basement height is 2035mm (6'-8").</p>  |



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| 31 <i>A minimum of 15% of the required long term bicycle parking stalls must be provided in a way that will accommodate oversized bicycles. Please refer to Schedule P for detailed requirements. A plan revision is required.</i>  | Schedule P provisions will be met.                                 |
| 32 <i>Staff strongly recommend that long term bicycle parking is provided to schedule C standards for all existing and proposed units. Please provide further details on the number and size of units within the existing building, and any current long term bicycle parking provision.</i>  | Bicycle parking requirements will meet Schedule C requirements.    |
| 33 <i>Please provide a preliminary servicing plan for review. Please show all existing and proposed service connections to both the new and proposed buildings.</i>   | Civil Engineer will be engaged for design as the project proceeds. |
| 34 <i>There is currently no storm drain main along Purcell Pl. The applicant will be required to either manage all of the stormwater onsite (if possible) or install a new storm drain main to the frontage of the property (the closest main is at the intersection of Purcell Pl and Moss St). If a main installation is required, it is to be secured by legal agreement prior to development permit approval.</i> | Storm water will be managed on-site. Civil Engineer to design.     |



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| <p>35 <i>The applicant is required to retain the services of a Qualified Professional to characterize soils to be excavated and removed from the jobsite in order to inform the disposal location and ensure compliance with Provincial Legislation. The soil assessment must include samples from proposed service trench locations, with a report to be provided to the City. This is required to allow the City to provide the most accurate estimate and to install the new services most efficiently. The cost to serve (including sampling and disposal of soil) is through a fees established through Bylaw, and for more information, refer to the City of Victoria's FAQs found on the City's website.</i></p> | <p>Understood.</p>                                  |
| <p>36 <i>Additionally, soil from a property with a current or former BC CSR Schedule 2 Activity must comply with provincial soil relocation requirements, including the one-week notification period prior to soil relocation.</i></p>  | <p>No Schedule 2 activity has occurred on site.</p> |
| <p>37 <i>A Street Occupancy Permit from Transportation Engineering will be required for work in the roadway.</i></p>  | <p>Understood.</p>                                  |
| <p>38 <i>Prior to commencement of excavation or soil relocation, contractors shall be registered under Bylaw 14-071, Schedule G: Code of Practice for Construction and Development Activities</i></p>   | <p>Understood.</p>                                  |



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| <p>39 <i>As per Missing Middle Design Guidelines, please demonstrate how stormwater will be managed on site. The City's rainwater management target is 32mm/24 hours. See the City's Rainwater Management Standards.</i></p>  | <p>Storm water will be managed on site. Civil Engineer to design.</p>  |
| <p>40 <i>Please include a rainwater management plan with design details and product specifications for site rainwater management, demonstrating how the design meets the City of Victoria Rainwater Management Standards, and achieves the rainwater management target.</i></p> | <p>See note above.</p>   |
| <p>41 <i>Please show the locations of all proposed on-site drains and their connection to the City storm drain main on the Building Permit plan submission.</i></p>   | <p>On site drains will be indicated on Civil Engineer's drawings. There is no Storm Drain to connect to - all storm water will be managed on site.</p> |
| <p>42 <i>Indicate on the Building Permit plan submission, in square metres, the:</i><br/> <i>o site impervious areas</i><br/> <i>o permeable surface areas</i><br/> <i>o rainwater management areas</i></p>   | <p>Will be included on BP drawings.</p>  |



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| 43 <i>Due to the proposed proximity of the building and pathway to the existing Horeschesnut tree measuring 110 cm diameter at breast height (DBH) along the East property line, exploratory excavation is required. Applicant must obtain a Protected Root Zone (PRZ) permit prior to completing exploratory excavation within the PRZ of the Horsechestnut tree. Any exploratory excavation must be directly supervised by the project arborist. Further details will be provided in the permit conditions. Complete a Tree Permit Application Form and submit to <a href="mailto:treepermits@victoria.ca">treepermits@victoria.ca</a> in order to obtain the permit.</i> | Arborist will investigate as the project advances. |



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| <p>44 <i>The memo from Talmack Urban Forestry issued November 21, 2023, does not meet Arborist Report requirements per Schedule "C" of the Tree Protection Bylaw No. 21-035.</i></p> <p><i>Applicant must provide an Arborist Report. The arborist report must be prepared by an International Society of Arboriculture (ISA) Certified Arborist with Tree Risk Assessment Qualification (TRAQ), in accordance with the City's Terms of Reference for an Arborist Report for Development and the requirements outline in Schedule "C" of the Bylaw No. 21-035 (Bylaw).</i></p> <p><i>The purpose of the Arborist Report for Development, prepared by an International Society of Arboriculture (ISA) Certified Arborist with Tree Risk Assessment Qualification (TRAQ), is to provide an inventory of the tree resource, analysis of potential impacts to trees, and recommendations for removal, retention, and tree protection measures. The Project Arborist must review up-to-date proposed plans; all hardscape, landscape, and grade changes; all proposed frontage works; and all underground and overhead utility services.</i></p> | <p>Understood. Refer to Updated Arborist report in resubmission package.</p>  |
| <p>45 <i>Please provide the construction methods, details, and specifications to be used for the installation of the foundation and comment on tree protection measures to be used.</i></p>   | <p>Foundation detail provided. Tree protection measures will be established by Arborist and Landscape Architect prior to BP submission.</p> |

| Comment   | Response   |
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| <p>46 <i>Applicant must provide a tree survey. The survey must be prepared following the requirements set out in Schedule "B" of the Bylaw No. 21-035. It shall be created based on the information provided by the Arborist Report. Please include off-site bylaw protected trees with critical root zones extending onto the property.</i></p>  | <p>Refer to resubmission package.</p>  |
| <p>47 <i>Applicant must provide a Tree Management Plan. The Plan must meet the requirements outlined in Schedule "B" of the Tree Protection Bylaw 21-035. The purpose of submitting the tree management plan is to show the location of trees along with their canopy spread and protected root zones in relation to proposed changes, so potential impacts can be analyzed, and trees can be identified as retained or removed. Additionally, the tree management plan is used to show where tree protection fencing, arborist supervision, ground protection or other mitigation measures are required.</i></p> | <p>Refer to resubmission package.</p>  |
| <p>48 <i>The scope of work triggers the requirement to meet the tree minimum as outlined in schedule "F" of the Tree Protection Bylaw 21-035. The property is approximately 973 m<sup>2</sup> (after the road dedication). A property of this size must have at least five [5] Bylaw-protected tree on the property following development. Since a Bylaw protected tree is shared with this property, four [4] trees must be selected from Schedule "E" Part 1 and one [1] tree from Schedule "E" Part 2 will be required to be planted on this property.</i></p>   | <p>Landscape Architect will be engaged for design as the project proceeds.</p> |



| Comment   | Response  |
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| <p>49 <i>Applicant must provide a Replacement Tree Plan. The Plan must meet the requirements outlined in Schedule "E" of the Tree Protection Bylaw 21-035.</i></p> <p><i>Careful consideration should be given to proposed tree species', crown spread at maturity and growing requirements.</i></p> <p><i>Replacement trees must be at least 2 m away from buildings, 1 m from property lines, and varied offsets from existing and proposed trees to allow sufficient space for crown and root growth based on tree size at maturity (See Schedule "E" Part 4 of bylaw for siting requirements of replacement trees).</i></p> | <p>Landscape Architect will be engaged for design as the project proceeds.</p>  |
| <p>50 <i>Please show the proposed location of all site servicing (water, sanitary sewer and storm drain) on both public and private property, including the Hydro/ Telecommunications and Fortis connections. Project arborist must review any proposed servicing within the Protected Root Zones (PRZ) of protected trees (on-site and off-site) and provide comments of potential impacts in the arborist report.</i></p>   | <p>Landscape Architect and Civil Engineer will be engaged for design as the project advances.</p>   |
| <p>51 <i>Please show the required offsite improvements along Purcell Pl as per transportations comments. Please ensure the Road Dedication and boulevard are clearly shown.</i></p>   | <p>Landscape Architect and Civil Engineer will be engaged for design as the project advances.</p> <p>Road dedication is not being provided.</p> |

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| <p>52 <i>New boulevard tree(s) will be required to be added to the Purcell PI frontage sited in accordance with the Victoria Subdivision and Development Servicing Bylaw No. 12-042. The species of tree(s) will be determined by the parks department at BP stage.</i></p>                                   | <p>Landscape Architect and Civil Engineer will be engaged for design as the project advances.</p> |
| <p>53 <i>The quantity and locations of municipal trees required will be determined once the road dedication and all servicing are reflected on plans.<br/>           Tree(s) to be paid for by applicant and planted by the city after approval of the BP. A fee of \$1250 per tree will be required.</i></p> | <p>Landscape Architect and Civil Engineer will be engaged for design as the project advances.</p> |
| <p>54 <i>A permit to work within the protected root zone will be required. As part of the work in the protected root zone permit, securities and tree protection measures will be required for retained trees.</i></p>  | <p>Understood.</p>  |
| <p><i>A permit for tree minimum will be required. As part of the tree minimum permit, securities will be required for trees planted on private property.</i></p>  | <p>Understood.</p>  |
| <p>55 <i>The egress from the top units do not appear to comply with 9.9.9.1. of the BCBC as units 3 and 4 are over unit 1 and 2 and the occupants will need to travel more than one storey to an egress door and there is no balcony at the top floor.</i></p>  | <p>Balcony added to upper floor to satisfy egress requirements.</p>                               |
| <p>56 <i>Please provide the spatial separations calculations for the unprotected openings for both buildings including the imaginary line between the two buildings.</i></p>  | <p>Spatial Separation calculations will be provided prior to Building Permit Submission.</p>      |
| <p><i>End of Comment List</i></p>   | <p>End of Response List.</p>  |