

June 3rd, 2026

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

Attention: Kasha Janota-Bzowska

RE: Development Permit Application - 1640 Earle Street - DDP01121

Dear Kasha Janota-Bzowska,

For your consideration, please accept this revised application for Rezoning and Development Permit for the property located at 1640 Earle Street, City of Victoria. Bamm Developments has revised the application in response to comments received from City of Victoria Staff following the technical review process.

Following these discussions, the project team has further refined the proposal through collaboration with the consultant team to address outstanding design and technical matters, including site planning and landscape integration..

We believe the revised application appropriately responds to the comments received to date and that all outstanding matters have now been addressed or resolved. Accordingly, we respectfully request that the application proceed to the next stage of review and approval.

We appreciate the ongoing guidance and feedback from City Staff throughout this process and look forward to this application proceeding to Development Permit issuance.

Comments Checklist/Response

To ensure every comment is addressed or acknowledged, a complete table of comments and responses is below.

Zoning Plan Check	
Comment	• Please provide Road Dedication area (m2)
Response	• Resolved ✓ • Please refer to revised architectural drawings.
Comment	• Break down soft and hard landscaping percentages within Open Lot Space - to be updated post road dedication
	• Resolved ✓ • Please refer to revised architectural drawings.
Comment	• Lot Coverage to be updated post road dedication

Response	● Resolved ✓ ● Lot coverage total has been calculated post road dedication. ● Please refer to revised architectural drawings.
Comment	● Please Show short-term bike parking stall dimensions as per Part 5. Please note on plans that 6 stalls are provided.
Response	● Resolved ✓ ● Please refer to the revised Landscape Architectural Drawings, which now include the design specifications for the proposed bicycle rack. The specified rack accommodates up to seven bicycles. ● Please also refer to the revised Landscape Architectural Drawings and Architectural Drawings for further details.
General Planning Comments	
Comment	● Integrate landscaping to soften hardscape areas associated with vehicle circulation and driveway access. ● The driveway access and the internal drive aisle area within the middle of the buildings should incorporate a minimum 1 m landscape buffer along edges while maintaining site lines and enabling casual surveillance.
Response	● Resolved ✓ ● Landscape treatments have been incorporated throughout the driveway access and internal drive aisle areas to soften the visual impact of the hardscape and vehicle circulation areas. ● These enhancements include additional planting beds and climbing vine elements integrated into the building architecture and site design. ● These design revisions have maintained required sight lines, safe vehicle maneuvering, and opportunities for casual surveillance. The proposed landscaping improves the pedestrian experience and contributes to the overall streetscape character without compromising functionality or safety. ● Please also refer to the revised Landscape Architectural Drawings.
Comment	● Please update the Landscape Cost Estimate Letter to include cost estimates for both soft and hard landscaping throughout the site. This is for on-site landscaping works only.
Response	● Resolved ✓ ● Please refer to the attached Cost Estimate Letter prepared by our Landscape Architect. ● Cost Estimate has been revised to include Soft and Hard Landscaping cost estimates for on-site landscaping works.
Comment	● Please consider relocating the short-term bicycle parking stalls to provide a further buffer from the retained Trees, and to locate the bike parking within an area that is hardscaped.
Response	● Resolved ✓ ● The location of the Class B bicycle parking has been maintained, as it provides the most convenient access for visitors while ensuring visibility from the public street and

	opportunities for passive surveillance. • The surface treatment within the bicycle parking area has been revised to a hardscape finish. • Please also refer to the revised Landscape Architectural Drawings.
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Land Development Comments	
Comment	• Per the Applicant response letter dated April 17, 2026, they acknowledged the requirement of registering the proposed 1.38m road dedication on title, prior to BP issuance and have affirmed that this will be done. A letter from the Servicing Officer shall be provided prior to DP issuance stating the road dedication requirement.
Response	• Acknowledged ✓ • The Servicing Officer Letter for the Road Dedication Requirement has been received and been provided to our Legal Counsel.
Underground Utilities Comments	
Comment	• As per the previous submission review comments, the proposed new water service has not been removed from the proposed driveway crossing. A suitable location would be south of the driveway within the driveway flare. A plan revision is required.
Response	• Resolved ✓ • The proposed new water service location has been revised and now proposed along the south of the driveway within the driveway flare. • Please refer to the revised Civil drawings prepared by JE Anderson.
Comment	• The revision list dated April 17, 2026 submitted with the April 22, 2026 resubmission indicates that Hydraulic Load Calculations (HLC) have been provided. However, none have been received. A 38mm service with a disproportionately small meter (25mm as proposed) cannot be provided. Please confirm the service and meter sizing and provide the HLC sheet to reflect this. A plan revision is required.
Response	• Resolved ✓ • Please refer to the Hydraulic Load Calculation (HCL) prepared by JE Anderson. • Please refer to the revised Civil drawings prepared by JE Anderson.
Comment	• The proposed new sanitary and storm service locations (if test for reuse of the existing services fail) do not meet City standards and must be installed in the same trench when possible. A suitable location is within the driveway crossing. A plan revision is required.
Response	• Resolved ✓ • In response to discussion with municipal staff, the existing sanitary and storm service connections are not proposed to be reused due to the age and condition of the existing infrastructure. • New sanitary and storm service connections are therefore proposed to serve the development.

	- The servicing design has been revised to locate the proposed sanitary and storm services within a common trench where feasible and in accordance with City standards. The revised service alignment is located within the proposed driveway crossing area, as requested. - Please refer to the revised Civil drawings prepared by JE Anderson.
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Parks Department	
Comment	Please provide a Tree Survey and Management Plan and a full Arborist Report as per Schedules “B” and “C” of Tree Protection Bylaw No. 21-035.
Response	Resolved ✓ - Please refer to the Tree Survey, Tree Management Plan and Arborist report prepared by Talmack Urban Forestry in support of this Development Application. - Please note, a Tree Survey and Management Plan was submitted with the previous application.
Comment	Tree #OS1 is proposed for removal to accommodate the proposed building, however the submitted arborist memo contains insufficient evidence to support its removal. If the tree cannot be retained, please ensure the full arborist report contains evidence based on the latest published International Society of Arboriculture Best Management Practices and industry standards to justify removal. Exploratory excavation along the extent of the anticipated cut that will be required to construct the proposed building may be needed to conduct a thorough assessment.
Response	Resolved ✓ - Tree “OS1” has been identified for removal as the proposed construction will detrimentally impact the tree and its critical root zone. - Please refer to the Tree Survey, Tree Management Plan and Arborist report prepared by Talmack Urban Forestry in support of this Development Application.
Comment	Two trees have been labeled “OS1”. Please clarify and amend so each tree has a unique ID number that corresponds with the arborist report.
Response	Resolved ✓ - Please refer to the revised Landscape Drawing Plans and Architectural Drawings.
Comment	The tree minimum for the site is five. With retained tree #3358 and the four replacement trees required, the site achieves tree minimum. Please identify and label on the plan which new trees proposed on the lot are to be designated as the required replacement trees.
Response	Resolved ✓ - Please refer to the revised Landscape Drawing Plans and Tree Replacement Plan prepared by project Landscape Architect
Comment	Please define the planting areas and required soil volumes for each replacement tree.
Response	Resolved ✓

	• Please refer to the revised Landscape Drawing Plans and Tree Replacement Plan prepared by project Landscape Architect
Comment	• Thank you for providing the Agent Authorization form from the owners on title at 1644 Earle St. If tree #OS1 requires removal, the replacement tree must be planted on the property at 1644 Earle St. as required under Tree Protection Bylaw No. 21-035. Please either amend the submitted Agent Authorization form for the homeowners to sign, or provide additional written consent from the property owners that they are aware that if a removal permit is obtained for tree #OS1, the one required Part 1 replacement tree conditioned in the permit shall be planted on their property at 1644 Earle St. The tree shall meet the species, stock size, soil volume, siting and setback requirements outlined within Schedule "E" of Tree Protection Bylaw No. 21-035.
Response	• Resolved ✓ • Please refer to the attached correspondence

Conclusion

BAMM Developments has carefully considered the comments and direction provided by City of Victoria Staff following the technical review of the Development Permit application for 1640 Earle Street, with respect to the relevant land use policies, technical requirements, and regulations.

With this resubmission, we have incorporated multiple revisions and refinements and believe we have addressed all comments received to date. The proposed development will make an important contribution to housing diversity in the area, supporting the City of Victoria's long-term housing objectives along a key transportation corridor.

We appreciate the guidance, collaboration, and feedback from City Staff throughout this process. The changes included in this resubmission enhance the project's alignment with applicable policy and help ensure it will be a positive contribution to the community for decades to come.

We believe that all outstanding issues related to the application have now been addressed and respectfully request Staff support to proceed with approval of the Development Permit for this much-needed housing.

Sincerely,



Ben Smith
Director
BAMM Developments