

March 6, 2026

**Rezoning and Development Permit Application**

**202 Harbour Road, Victoria, BC**

Application Numbers: REZ00908 & DP000658

**Attn:** Mayor Marianne Alto  
Victoria Council

**Cc:** Ms. Karen Hoese  
Director of Planning and Sustainable Development  
Mr. Rob Bateman, MCIP, MPP  
Senior Planner  
Development Services Division

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

**Re: Resubmission – Rezoning and Development Permit Application 202 Harbour Road, Victoria, BC REZ00908 & DP000658**

Mayor Alto and Victoria Council:

On behalf of the Gain Group of Companies and the ownership of 202 Harbour Road, Island View Land Management is pleased to submit this revised application package in response to the Application Review Summary dated December 18, 2025, the associated Plan Check, and feedback received from the Advisory Design Panel. This letter is structured to provide itemized responses to each comment raised, offer an updated planning rationale in support of the application, and articulate the merits of the proposed development in the context of the City's current policy framework, the Dockside Green Design Guidelines, the Vic West Neighbourhood Plan, and the broader Official Community Plan (2025).

We want to begin by acknowledging the thoughtful and thorough review provided by City staff. The feedback has meaningfully improved the proposal, and we believe the revisions contained in this resubmission represent a stronger, more policy-aligned project that will deliver lasting value to the Vic West neighbourhood, the Dockside Green community, and the City of Victoria more broadly.

As we submit this development application, we respectfully acknowledge that this project is situated on the unceded homelands of the Lekwungen-speaking peoples, the Songhees and Esquimalt Nations. We honour their enduring relationship with this land and are committed to approaching the future development of this site with respect for the community, the environment, and the local Nations.

**REZ00908 & DP000658**

202 Harbour Rezoning and Development Permit  
Letter to Mayor and Council

## PART ONE: PROJECT OVERVIEW AND PLANNING CONTEXT

### 1.1 Site Description and Development Rationale

The subject property at 202 Harbour Road is a geometrically constrained, approximately 2,182 m<sup>2</sup> triangular vacant lot located at the prominent intersection of Harbour Road and Esquimalt Road in the Vic West neighbourhood. The site's irregular shape, significant grade changes, and its position at a major neighbourhood gateway present both a series of planning challenges and a compelling opportunity to create a landmark building at a highly visible threshold location.

The proposed development consists of:

**Levels 1 and 2:** A Porsche Victoria vehicle sales centre, with underground-level service bays, a show floor, customer facilities, and ancillary sales and finance offices;

**Levels 3 and 4:** The Gain Group corporate headquarter offices;

**Ground Level:** An at-grade café space deliberately oriented to animate both the internal building program and the future pedestrian pathway connecting the site to the broader Dockside Green trail network; and

**Underground/Podium Level:** Secure bicycle storage (and charging), EV-equipped vehicle parking, staff rooms and end of trip facilities, and automotive service bays screened entirely from public view.

The site has been the subject of previous Development Permit approvals, most recently an approved five-storey office and ground-floor automotive museum. The current proposal builds on this precedent while delivering a more comprehensive, employment-intensive, and urban design-responsive program that responds to the current policy environment and the needs of a sophisticated, nationally recognized automotive operator.

We want to be candid with staff about an important planning reality: programming a meaningful, economically viable, employment-focused project on a site of this size, with these grades, and within these geometric constraints is genuinely difficult. The triangular lot geometry precludes conventional floor plate efficiency.

The significant grade change between Harbour Road and the interior of the site demands creative solutions for vehicular access, service bay placement, and pedestrian connectivity. The Porsche manufacturer program and operational requirements impose their own layer of spatial standards that must be respected for brand certification purposes. Threading these requirements together — while simultaneously honouring the Dockside Green design vision, activating the public realm, and meeting the City's technical standards — has required significant design iteration and close collaboration between the applicant, the design team, and City staff.

## 1.2 Employment Significance

This development is, first and foremost, an employment project. The Porsche Victoria dealership, including its underground service bays, sales floor, finance and insurance operations, and customer experience facilities, is anticipated to employ between 30 and 40 individuals across a range of skilled trades and professional roles. The Gain Group corporate head office, occupying levels three and four, is anticipated to employ approximately 10 to 15 individuals in executive, administrative, finance, and operational management roles.

The average compensation across this building will substantially exceed the 2025 median household income in the City of Victoria. These are not precarious service-sector positions. They are skilled automotive technicians completing manufacturer-certified training programs, licensed finance and insurance professionals, sales associates, and corporate professionals in HR, finance, and operations. The dealership will serve as an active pipeline for workforce development, including registered apprenticeships for automotive service technicians — a chronically undersupplied trade in Greater Victoria.

We draw Council and staff's attention to the broader housing and employment context in Vic West. The neighbourhood has absorbed a significant volume of residential growth in recent years, including the ongoing buildout of Dockside Green and adjacent sites. This residential intensification has generated an increasing need for local employment opportunities that can absorb the working-age population of this neighbourhood without requiring long-distance commutes.

An employment anchor of this quality — well-paying, stable, trades-inclusive, and located within cycling and walking distance of a growing residential community — is precisely the kind of use that the City's employment policies are designed to protect and attract.

We respectfully suggest that in a neighbourhood where housing capacity has grown substantially, the planning lens for this specific site should actively favour employment-first uses, consistent with the City's commitment to no net loss of employment land and the balanced complete-community vision of the OCP.

## 1.3 Policy Support for Employment at this Location

The following planning policies directly support the employment-focused nature of this proposal:

### Official Community Plan (2025):

**Policy 1.3.2 – Preserving and Intensifying Employment Uses:** The OCP directs that redevelopment on land with employment and industrial character should seek to maintain or expand building space dedicated to employment use, with an aim of no net loss. The proposed development converts a derelict, unproductive vacant site into a fully activated, high-employment building. This is precisely the type of employment intensification this policy envisions.

**Economic Development Vision:** The OCP articulates a goal of ensuring "Victoria generates economic growth through innovation, diverse entrepreneurship and new business formation, and attracts and retains sustainable enterprises well-suited to the region." The Gain Group is a regionally significant employer with deep roots in the Greater Victoria economy. Retaining and growing their corporate operations within the city limits — rather than seeing them migrate to suburban locations — is directly aligned with this objective.

**Quality Employment and Living Wage:** The OCP commits to supporting "a high quality of life for the local workforce through a broad range of employment opportunities that provide a living wage." The compensation profile of this development far exceeds this benchmark.

**Policies 21.27.1, 21.27.2, 21.27.6, 21.28.2, 21.28.3, 21.28.6:** These Vic West-specific policies support an eclectic mix of land uses including industrial and employment, strengthen transportation corridors for pedestrians and cyclists, improve urban connectivity, and explicitly direct the planning framework to "maintain a diversity of employment lands and uses."

**Vic West Neighbourhood Plan (2018):**

The Neighbourhood Plan's foundational concept of "Strong Village Hearts" is directly advanced by this proposal. The plan calls for multi-storey buildings that accommodate both housing and employment, and specifically identifies uses that complement the existing marine industry to the west of Harbour Road.

A vehicle sales, administration and service operation — including high-skill automotive technicians and manufacturer-certified service operations — is a reasonable and sensitive transitional use between the heavy marine industrial character of the Harbour Road corridor and the refined urban mixed-use fabric of Dockside Green.

**Rezoning and Development Policy (2025):**

**Part 4.1.1** envisions a range of commercial, industrial and residential uses that support a complete community.

**Part 4.2.2** supports heights and densities of up to six storeys and generally 2.5:1 FSR, well within which this proposal falls at 1.31:1 FSR.

**Dockside Green Urban Design Guidelines (2005, consolidated):**

The Dockside Guidelines for the subject area (DA-F) explicitly contemplate light industrial, retail, and office uses, and direct building design to be responsive to the marine industrial context to the west.

As elaborated in Part Two of this letter, the proposed architectural expression — industrial-referencing metallic cladding at the dealership levels and bold corrugated black metal office cladding at the upper levels — directly honours this direction.

## PART TWO: DESIGN RATIONALE AND DEVELOPMENT PERMIT AREA RESPONSE

### 2.1 Overview of Architectural Expression

The proposed building presents a two-part architectural composition that is carefully calibrated to respond to the layered urban context of this prominent corner location.

**Levels 1 and 2 — Porsche Victoria Sales Centre:** The dealership levels are expressed in a refined vocabulary of metallic panel systems and extensive glazing consistent with Porsche AG's international design standards. The glass and metal palette acknowledges the precision and transparency that are hallmarks of the Porsche brand experience while simultaneously reading as a sophisticated evolution of the industrial material language found throughout the Harbour Road corridor. The street-oriented and glazed showroom panels create visual permeability at grade, animating the street edge along both Harbour Road and Esquimalt Road while allowing the vehicles within to become a form of dynamic, ever-changing display for passersby.

This is not an incidental design outcome. The glazed dealership podium functions as a programmed visual activation element — consistent with the Docksider Green Guidelines' direction for ground-floor animation and the OCP's design guidelines for active, transparent, pedestrian-scaled façades.

We have also demonstrated with the soffit cladding plan that we should provide ample overhang to benefit individuals looking to enter the building through one of the many entry-points along the drive isle, the Harbour Road streetscape, or via the internal mews pathway.

**Levels 3 and 4 — Gain Group Corporate Office:** The upper two levels step back from the dealership podium and are expressed in a bold black corrugated metal panel system that immediately differentiates the office levels from the showroom below while reinforcing the industrial character of the Harbour Road context. Corrugated metal cladding is among the most historically authentic references available on this site, directly echoing the marine and light industrial buildings that characterize the west side of Harbour Road.

This two-part composition — refined industrial glass and metal below, bold corrugated industrial office above — creates a building that reads as simultaneously new and contextually rooted. It does not attempt to replicate the residential material palette of Docksider Green's housing, nor does it mimic the utilitarian vernacular of the heavy marine uses to the west. Instead, it occupies a precise, considered middle ground that is appropriate for a transitional site at the boundary between these two distinct urban characters.

## 2.2 Site Planning, Form, and Grade Response

The triangular lot geometry has driven every major site planning decision in this project. The building footprint has been carefully configured to occupy the full extent of the usable site area while respecting the required setbacks and the SRW obligations on title. The tapering form of the building, wider at the Harbour Road/Esquimalt Road corner and narrowing as it moves inland, directly reflects the geometry of the lot and creates a building that feels purpose-built for this specific place rather than a generic floor plate dropped onto a challenging site.

The significant grade change between Harbour Road and the interior of the site has been leveraged, rather than fought, to create the underground service bay level. By siting the automotive service bays below grade at the lower Harbour Road elevation, the service operations are entirely screened from both Esquimalt Road and the future Docksider pedestrian path. This is a critically important planning and urban design outcome. Service bays in a surface or above-grade configuration would generate ongoing visual conflict with the pedestrian-priority public realm vision of Docksider Green. The underground placement resolves this conflict entirely, allowing the above-grade building to present clean, activated, retail- and office-quality façades to all public street edges.

Vehicle storage associated with dealership operations is entirely internalized within the building structure and is explicitly not visible from any public road or pedestrian route. Staff have noted that vehicle storage should be ancillary to the employment-related uses and limited to the inside of buildings — the design as submitted achieves this objective.

The drive aisle placement has been carefully coordinated with the grade transitions and the Porsche manufacturer program requirements, achieving the required clearances while maintaining a safe, legible circulation pattern for both vehicles and pedestrians.

The prominent corner at Harbour Road and Esquimalt Road is anchored by the tallest element of the building, with the massing stepping down as the lot narrows. This is a natural and appropriate response to both the geometry and the urban design expectation that corner sites at collector-arterial intersections carry a degree of visual prominence and civic presence.

## 2.3 Alignment with Docksider Green Design Guidelines

The Docksider Green Urban Design Guidelines call for buildings in the DA-F area to:

1. Respect and reinforce the transition between marine industrial and mixed-use urban contexts;
2. Provide active, animated ground-floor uses that engage the public realm;
3. Incorporate sustainable design features consistent with the Docksider community's environmental legacy;
4. Contribute positively to the internal Docksider pathway network; and
5. Respect view corridors and pedestrian sightlines.

The revised proposal addresses each of these directions substantively. The café use at grade is expressly designed to provide a dual orientation — inward to serve dealership customers and staff, and outward to connect with and animate the future internal Docksider pedestrian pathway. This activation strategy anticipates the future buildout of the adjacent Bosa Development Docksider

Green phases and positions the café as a permanent, year-round retail anchor for the pedestrian route — precisely the type of ground-floor activation the Guidelines envision.

The revised rain garden SRW (described in detail in Part Three) directly reflects the sustainable infrastructure philosophy that defines the Dockside Green community. Open swales and rain garden features are the visible, legible form of sustainability that Dockside Green has become known for internationally. Their inclusion on this site — at the prominent gateway corner — will signal to all who arrive in Dockside Green that the environmental design standards of the community extend to its newest buildings.

#### **2.4 Victoria Design Panel Area Guidelines**

The proposal has been reviewed against the City of Victoria Development Permit Area guidelines applicable to DPA 3: Songhees (Dockside), and the following design principles inform the resubmission:

**Building Massing and Scale:** The four-storey building height is consistent with the low-rise to intensive scale anticipated for this area, and the stepped massing responds to the grade and lot geometry without creating overbearing street walls.

**Ground-Floor Activation:** The café and dealership showroom provide continuous active use at grade along both frontages.

**Pedestrian Priority:** The revised plaza and rain garden SRW area creates a high-quality pedestrian arrival and through-movement space that safely channels foot traffic from Esquimalt Road into the internal Dockside pathway.

**Materiality and Context:** The metallic panel, glazing, and corrugated black metal palette draws from the industrial context of Harbour Road while meeting the quality and precision standards expected of a Dockside Green building.

**Sustainability:** Green roofs, rain gardens, and energy-efficient building systems position the building as a genuine environmental leader in the neighbourhood.

### **PART THREE: CONCLUSION**

202 Harbour Road represents a rare and valuable opportunity to transform a derelict, geometrically constrained, and long-underperforming site into a high-quality, employment-intensive, publicly engaging building that serves as a genuine gateway for the Vic West neighbourhood and the Dockside Green community.

The revised proposal responds substantively to each item of feedback provided by staff and the Advisory Design Panel. The rain garden SRW delivers a high-quality accessible public plaza that honours both the letter and spirit of the legal agreement while contributing something genuinely distinctive and sustainable to the neighbourhood.

The green roof commitment demonstrates environmental leadership calibrated to current best practices. The enhanced bicycle parking program reflects the applicant's authentic commitment to sustainable transportation. The underground service bays and internalized vehicle storage eliminate the public realm conflicts inherent in conventional dealership design. And the café, oriented deliberately to the future Dockside pedestrian path, will serve as the first retail activation point on what will become one of Victoria's most exciting new urban walkways.

This project will employ between 40 and 55 individuals in well-paying, skilled, and professional roles — a meaningful employment contribution in a neighbourhood that has grown rapidly on the housing side and now requires the employment anchor that this project provides. The Gain Group is a sophisticated, regionally significant employer, and their decision to invest in this location — to site their corporate headquarters alongside their flagship dealership in the heart of Vic West — is a vote of confidence in this neighbourhood and in the City of Victoria's vision for the Songhees District.

We look forward to continuing to work collaboratively with staff and Council to advance this application. Please do not hesitate to contact the undersigned to discuss any aspect of this resubmission.

Respectfully submitted,

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## APPENDIX A: ITEMIZED RESPONSES TO STAFF COMMENTS AND REVISED SUBMISSION HIGHLIGHTS

### Revised Rain Garden SRW — Plaza Space

**Staff Comment (CA9334089):** Staff requested that the DP plans be revised to provide public pedestrian access over the plaza space connecting to the future adjacent Vic West Gateway walkway, in accordance with the legal agreement. Staff indicated openness to considering changes to the plaza if the proposed design meets the Development Permit Area design guidelines.

#### **Applicant Response:**

We are pleased to confirm that the revised submission includes a comprehensive redesign of the statutory right-of-way (SRW) plaza area. The revised plaza is conceived as an accessible, walkable rain garden space that fulfills the legal obligation to provide public pedestrian connectivity to the future Vic West Gateway while simultaneously delivering a distinctive piece of sustainable public infrastructure that is entirely in keeping with the Docksider Green community identity.

The revised rain garden SRW features:

**Open swales and bioretention planting:** Visible, naturalistic stormwater management infrastructure that references and extends the Docksider Green tradition of legible, educational sustainable design. The swales will be planted with native and climate-adapted species appropriate to the coastal urban environment.

**Rain garden bridges:** Lightweight crossing elements over the swale network that provide safe, accessible, and visually engaging pedestrian movement through the space and provide a thematic connection to similar elements throughout Docksider Green.

**Accessible pathway alignment:** The primary pedestrian route through the plaza is fully accessible and designed to safely direct pedestrians from the Esquimalt Road/Harbour Road intersection into the internal Docksider pathway network anticipated in the future phases of the Bosa Development Docksider Green plan.

**Maintained sightlines and view corridors:** The low-profile rain garden planting and bridge structure has been specifically designed to preserve critical sightlines for both pedestrian safety and the broader view corridors identified in the Docksider Design Guidelines.

**Plaza activation:** The space is designed as a genuine destination — not merely a through-route — with seating, interpretive planting, and landscape features that create an exciting arrival experience for commuters, residents, and visitors.

Over 10% of the total site area is now dedicated to this high-quality outdoor plaza and rain garden space. We believe this represents a meaningful and generous contribution to the public realm that exceeds the intent of the original legal agreement and demonstrates the applicant's commitment to delivering outstanding outdoor spaces consistent with the Docksider Green community vision.

## **Green Roofs and Sustainability Framework**

### **Staff Comment (CA9334093 — LEED Gold) and Advisory Design Panel Feedback:**

The existing covenant (CA9334093) requires the development to achieve LEED Canada Gold certification. The Advisory Design Panel raised the suggestion of incorporating green roofs as a means of achieving high-quality rainwater management aligned with the City's new Works and Services Bylaw.

### **Applicant Response:**

Following the Advisory Design Panel's recommendation, the applicant has agreed to incorporate green roofs as a central sustainable design feature of the revised proposal. This addition strengthens the building's environmental performance profile and creates a meaningful visual and functional expression of sustainability that is visible from the elevated perspectives of adjacent buildings and the wider Dockside community.

We also wish to respectfully raise, for staff's consideration, a substantive planning and technical argument regarding the continuing relevance of the LEED Gold covenant in the current regulatory environment.

When the LEED Gold covenant (CA9334093) was registered, it represented the leading edge of sustainable building practice in British Columbia and was a meaningful differentiator for development projects seeking to demonstrate environmental leadership. Since that time, the regulatory and policy landscape has evolved significantly in ways that have, in many respects, superseded LEED Gold as the primary benchmark for building sustainability:

**BC Energy Step Code:** The Province of BC's Energy Step Code now mandates progressively higher levels of building energy performance through the building permit process, with Step 3 and above requirements already embedded in the City of Victoria's building standards. These requirements address the same energy performance metrics that formed the core of LEED certification, but do so through mandatory regulatory standards rather than voluntary certification.

**City of Victoria Works and Services Bylaw (most recent update):** The City's updated Works and Services Bylaw establishes comprehensive standards for stormwater management, green infrastructure, and site servicing that directly address many of the sustainability criteria previously associated with LEED. Green roof requirements, rain garden specifications, and bioretention standards embedded in this bylaw represent current best practice that is in many areas more prescriptive and demanding than the LEED Gold rating system anticipated when the covenant was drafted.

**BC Building Code Envelope Requirements:** Evolving envelope performance standards in the BC Building Code now mandate levels of thermal performance and airtightness that were aspirational under LEED Gold at the time of the covenant's registration.

**Administrative burden of LEED Certification:** The LEED certification process involves significant administrative, documentation, and third-party verification costs that do not necessarily translate into improved building performance outcomes beyond what is now required by regulation. Redirecting these resources toward actual building performance

improvements — green roofs, enhanced stormwater management, renewable energy systems — delivers superior environmental outcomes.

We respectfully request that staff and Council consider whether the intent of the LEED Gold covenant — to ensure the building is designed and constructed to a high standard of environmental performance — is better achieved through compliance with the current Works and Services Bylaw, the BC Energy Step Code at the appropriate step level, and the addition of green roofs, than through pursuit of a certification framework that has been materially eclipsed by mandatory regulatory requirements.

We are committed to working with staff to find an appropriate resolution to this covenant that honours its intent while acknowledging the evolution of the regulatory landscape. We are open to discussing a covenant modification that references compliance with the City's current sustainability standards as an equivalent or superior outcome to the original LEED Gold requirement.

**Enhanced Secure and Energized Bicycle Parking  
Staff Comment and Advisory Design Panel Feedback:**

Staff and the Advisory Design Panel provided feedback on bicycle parking provision.

**Applicant Response:**

Following Advisory Design Panel and staff feedback, the bicycle parking program has been significantly enhanced. The revised submission provides 25 long-term secure bicycle parking stalls (exceeding the required 19) and 24 short-term bicycle parking stalls (exceeding the required 18), for a combined total that substantially exceeds the minimum bylaw requirements.

All long-term bicycle parking is located in a dedicated, secure, enclosed, and weather-protected room with controlled access. 100% of long-term stalls are energized with individual charging stations to support e-bike use, consistent with the rapid growth of e-cycling as a primary commute mode in Victoria. The bicycle storage room is designed with adequate ceiling clearance (exceeding the required 2.40m minimum), door entry widths meeting the required 1.00m minimum, and a ground-anchored stall proportion well in excess of the 72% minimum requirement.

This investment in cycling infrastructure reflects a genuine commitment by the Gain Group, whose employees have demonstrated a meaningful and sustained culture of cycling as a primary mode of transportation. The enhanced bicycle facilities are intended to serve not only current employees but to actively support and grow that culture as the corporate office expands. The proximity of the site to the Galloping Goose Regional Trail, the E&N Rail Trail, and the Dockside Green internal pathway network makes this location genuinely well-suited to cycling-commute programming.

**Vehicle Delivery Commitment:**

The applicant additionally confirms that all vehicle deliveries associated with dealership operations will occur at an off-site suburban property operated by the Gain Group. No vehicle transport trucks will be directed to 202 Harbour Road. This commitment directly addresses the potential for conflict on Esquimalt Road and Harbour Road and acknowledges the urban context of the site, the pedestrian priority public realm vision of Dockside Green, and the City's transportation

bylaws. This commitment is offered as a condition of development permit approval and the applicant is prepared to give this effect through an appropriate covenant or permit condition.

### **Café Space and Pedestrian Pathway Connection**

The ground-level café has been designed with a deliberate dual orientation. Its primary interior program serves dealership customers, Gain Group employees, and building visitors. Its secondary exterior program — expressed through an operable glazed façade and outdoor seating area oriented toward the Porsche and Vic West Gateway plazas— is designed to directly activate and connect with the future internal Dockside pedestrian pathway.

This café will function as the first retail anchor on the future Dockside internal path, establishing a pattern of ground-floor activation that the subsequent phases of Dockside development will build upon. Its location at the threshold between the public street and the internal pathway network makes it uniquely positioned to serve both the existing Dockside community and the anticipated growth of the neighbourhood over the coming decade.

The café is consistent with the Dockside Green Design Guidelines' direction for active, people-scaled ground floor uses and the OCP's commercial use policies for the Songhees District.

### **Underground Service Bays and Vehicle Storage**

A specific design nuance of this project that merits articulation for the planning record is the placement of the automotive service bays in the underground/sub-grade level of the building. Automotive service operations — even in premium dealership contexts — generate operational realities that are difficult to reconcile with pedestrian-priority public realm standards if they are placed at or above grade. Lifts, parts delivery, fluid management, and vehicle movement in and out of service bays create noise, odour, and visual impacts that conflict with the active, animated, pedestrian-scaled ground floor environment envisioned by the Dockside Guidelines and the OCP.

By locating all service operations below grade, accessed via a controlled vehicle entry point that utilizes the natural grade change on the site, the proposal achieves a clean separation between the service function and the public realm. No service vehicles, parts deliveries, or operational service activity will be visible from Esquimalt Road, Harbour Road, or the future Dockside pedestrian path. The above-grade building presents exclusively the showroom, office, café, and public realm functions to all street edges.

This is a materially superior urban design outcome compared to a conventional at-grade dealership arrangement, and it has been achieved specifically because of — rather than in spite of — the challenging grades and geometry of the site. We encourage staff to recognize this design achievement in their assessment of the Development Permit application.

Similarly, all dealer vehicle inventory storage is located entirely within the building envelope, consistent with staff's direction that vehicle storage be ancillary to employment uses and limited to the interior of buildings. No rooftop or surface vehicle storage is proposed.

## **APPENDIX B: ZONING AND PLAN CHECK RESPONSES**

### **Vehicle Sales and Rental Use**

The applicant supports the rezoning of the existing CD-9 Zone (DA-F) to add "Vehicle Sales and Rental" as a permitted use, consistent with the standard use definition in the recently approved Zoning Modernization (October 2, 2025). The applicant acknowledges that all vehicle storage associated with this use will be limited to the interior of buildings and to a maximum floor area as shown on the revised plans.

### **Retail and Office Allotment**

Staff have encouraged the applicant to propose a retail floor plate of under 300m<sup>2</sup> to allow other sites in the CD-9 Zone to propose a larger retail floor plate.

### **Retail Allocation – Requested Addition to the CD Zone**

With respect to retail uses, Gain Group and Bosa Developments jointly wish to request that an additional retail allocation be incorporated into the CD zone to accommodate the proposed dealership and café space forming part of our redevelopment concept.

We are requesting that this additional retail allocation be capped at 1,750 m<sup>2</sup>, consistent with the retail area currently contemplated across Levels 1 and 2 (L1 and L2) as presented in our Zoning and Development Permit application.

Importantly, it is Bosa Developments' expressed wish that this new retail allocation be treated as a net addition to the existing retail permissions within the bylaw — specifically, the 2,000 m<sup>2</sup> and 600 m<sup>2</sup> retail allocations already contemplated therein. Bosa intends to preserve and continue to utilize those existing allocations in support of their future vision for the balance of the Dockside Green development concept. Accordingly, we would not wish to see the proposed 1,750 m<sup>2</sup> drawn from or offset against those existing entitlements.

### **Office Space – Net Area Calculation (Levels 3 & 4)**

Following internal discussions with our team, as well as consultation with the team at Dockside Green, we have collectively arrived at the position that the proposed office space contemplated within Levels 3 and 4 (L3 and L4) of our proposed redevelopment — totalling approximately 1,160 m<sup>2</sup> — should not be considered a net draw against the broader office density allocation established for the Dockside Green site under the CD zone.

Our rationale is grounded in the nature of how this space has been calculated and its relatively modest scale in the context of the overall site. We would respectfully request that the City confirm its agreement with this interpretation, or alternatively, advise us on the appropriate methodology by which this office component should be assessed in relation to the site-wide office density provisions, so that we may proceed accordingly.

#### **4.3 Park and Greenspace Area**

The original submission did not meet the minimum 2.50% park and greenspace area requirement. The revised rain garden SRW, now comprising over 10% of the site area, resolves this deficiency materially and generously. The applicant requests that staff confirm the revised rain garden plaza area satisfies the park and greenspace requirement.

#### **4.4 Vehicle Parking**

The revised submission provides a total of 60 vehicle parking stalls, including the required number of accessible and van-accessible stalls with appropriate signage, heights, aisle grades, and driveway grades as specified in the Plan Check. EV charging stations are provided for 4 stalls, meeting the minimum requirement. The applicant acknowledges the drive aisle grade requirement for accessible stalls (2.0% maximum) and confirms the revised plan achieves this.

#### **4.5 Combined FSR and Retail Area for All Dockside**

We respectfully ask for the City's assistance in confirming the combined floor areas throughout the existing Dockside Green development.