



June 2, 2026

City of Victoria
Sustainable Planning and Community Development 1
Centennial Square
Victoria, BC V8W 1P6

Attention: Mayor and Council,

Re: Rezoning and Development Permit Application for 1908 Foul Bay Road, City of Victoria

On behalf of TL Oak Bay Property Inc., we are pleased to provide this updated summary of the proposed rezoning and development permit application for 1908 Foul Bay Road.

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Since the initial submission, the project has undergone a comprehensive design evolution in response to staff comments, updated policy direction, and technical review. The revised proposal reflects a balanced and considered approach that aligns with the intent of the Official Community Plan, the Jubilee Town Centre and Fort at Richmond Village Rezoning and Development Policy, and the City's design guidelines, while responding to site-specific constraints and the need to deliver viable purpose-built rental housing.

Introduction

RLA Architects Inc. is the Project Architect for 1908 Foul Bay Road and is submitting this letter on behalf of TL Oak Bay Property Inc. The property is one of several regional sites where investment in telecommunications infrastructure is allowing redundant telephone exchanges to be decommissioned. The proposal seeks to remove the existing redundant TELUS Central Office and surface parking area to enable a six-storey purpose-built rental building.

The site was originally designated Traditional Residential under the Official Community Plan and zoned R1-B, which permitted up to two storeys. It is presently improved with a two-storey telecommunications building and does not contain any residential uses; therefore, redevelopment will not result in tenant displacement. During the course of the application, the City advanced and adopted a new Official Community Plan framework, and staff advised that this updated policy direction may apply to the review of the proposal. As reflected in staff comments, the site lies within a new Town Centre Area, which provides the policy basis for the proposed rezoning to a site-specific [CD] zone and for the additional building height and density (including the height variance from the 14 m by-right standard). The application accordingly seeks the rezoning to enable the proposed form of development.

The proposal will deliver a well-designed purpose-built rental building, and we look forward to working collaboratively with City staff and the community to advance the project.

Project Overview

The proposal consists of a six-storey, wood-frame purpose-built rental building over a single level of underground parking, delivering approximately 87 residential units at a moderate density of approximately 2.5 FSR. The project contributes much-needed rental housing in a transit-supportive location, within walking distance of key amenities, employment, and services.



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The design thoughtfully integrates with the surrounding context, strengthens the public realm, and introduces meaningful landscape and environmental improvements, while accommodating site constraints including the required 3.0 m road dedication along Foul Bay Road.

The proposed unit mix is consistent with the needs of the community and the City of Victoria Family Housing Policy. We propose the following unit mix:

Units Mix		Mix Units Size	Units	Total		
Units						
S	Studio	7%	434 sf	6	2,604 sf	Studio 7%
A1	1 Bedroom	30%	530 sf	26	13,780 sf	1 Bedroom 43%
A2	1 Bedroom + Flex	14%	656 sf	12	7,872 sf	
A2e	1 Bedroom	6%	581 sf	5	2,905 sf	1 Bedroom + Flex 14%
A2ap	1 Bedroom (adaptable)	7%	581 sf	6	3,486 sf	
B1	2 Bedroom 2 Bath	5%	798 sf	4	3,192 sf	2 Bedroom 23%
B2	2 Bedroom 2 Bath	7%	852 sf	6	5,112 sf	
C2	2 Bedroom 2 Bath Corner	11%	797 sf	10	7,970 sf	
D1	3 Bedroom 2 Bath Corner	7%	991 sf	6	5,946 sf	3 Bedroom 14%
D2	3 Bedroom 2 Bath Corner	7%	1090 sf	6	6,540 sf	
		100%				
	Average net Unit size		683 sf	87	59,407 sf	
Total GFA					71,694 sf	
					Efficiency 83%	100%

Parking for the development is summarized as follows:

Car Parking						Parking Area
	Required Residential (Core Area)		Units	Required Stalls	Proposed	22,550 sf
45 sm (484 sf)	< 45 sm (484 sf)	0.60 /unit	6	4		2,095.1 m2
	< 70 sm (753 sf)	0.70 /unit	49	34		
	> 70 sm (753 sf)	1.10 /unit	32	35		
			87 Total	73	54	
	Required Accessible	2 cars / 51-75 spaces		2 incl'd above	2 incl'd above	
	Required Van Accessible	1 car / 51-75 spaces		1 incl'd above	1 incl'd above	
	Total Residential Cars			73	54	
	Required Visitor	0.10 /unit	87	9	7	
	Required Visitor Accessible	0 cars / 6-25 visitor spaces		0 incl'd above	0 incl'd above	
	Required Visitor Van Accessible	1 car / 6-25 visitor spaces		1 incl'd above	1 incl'd above	
	Total Visitors Parking			9	7	
			Total	82	61	0.70
Long Term Bike Parking						
	Required				Proposed	
	< 45 sm (484 sf)	1.00 /unit	6	6		
	> 45 sm (484 sf)	1.25 /unit	81	101		
				Total	107	108
Short Bike Parking						
	Required					
	Greater of 6 or	0.1 /unit	87	9	8	

Site Layout

The site is located at Foul Bay Road and Bouchier Street, with a gross area of 28,105 sq. ft. A 3-metre road dedication along Foul Bay Road reduces the net site area to 26,920 sq. ft.

The building is oriented east-west to maximize southern exposure and natural light. Given Bouchier Street's quieter character, the main lobby, elevator access, and underground parking entry are located along this frontage.

Ground-floor homes facing the street are ground-oriented with direct sidewalk access and fenced patios, improving accessibility and supporting pet-friendly living.



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Setbacks along Bouchier Street, Foul Bay Road, and the rear yard provide space for landscaping, patios, and outdoor amenity areas while maintaining a strong street wall along the primary frontages.

The 3,135 SF of rear outdoor amenity space connects directly to the approximately 630 sq. ft. indoor amenity room, improving visibility and resident access. Existing trees along the west and north edges will be removed, with replacement trees and cash-in-lieu provided where required, as outlined in the arborist report.

The existing west-side pathway will remain in place, with adjacent landscape improvements proposed.

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Architectural Rationale

The building reflects West Coast Modern design through large protective overhangs, natural material tones, contrasting cladding, and a balanced colour palette. The overhangs provide shade, weather protection, and a more defined entrance, while natural hues help the building relate to its surrounding landscape.

Contrasting cladding and darker accent colours break down the building massing into well-proportioned components and add visual interest. Lighter tones help soften the overall form, while natural stone veneer on the frontage landscape walls enhances the quality of the public realm.

The design supports modern rental living for families and professionals seeking a contemporary, functional, and environmentally conscious home.

Design Evolution and Response to Staff Direction

The project team has made a number of meaningful refinements in response to staff comments and policy updates, including:

- strengthening the ground-floor interface and future adaptability;
- reducing the parkade footprint to support landscape and stormwater objectives;
- enhancing landscaping, soil volumes, and tree planting;
- revising the stormwater strategy to prioritize surface-based green infrastructure; and
- refining the amenity strategy, including provision of a green roof.

These revisions reflect a deliberate effort to align with City objectives while maintaining the feasibility of delivering purpose-built rental housing.

Ground-Floor Activation and Future Adaptability

In response to staff feedback, the ground-floor ceiling height for Units 104, 105, and 106 has been increased from 9' to 10'. We respectfully request to proceed to Committee of the Whole with the current 10' design.

The proposal also supports potential future live-work functionality through:

- direct sidewalk-oriented entries;
- generous glazing and street-facing presence;



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- private patios and landscape interface;
- weather protection and lighting; and
- potential future signage opportunities.

This approach creates an active and pedestrian-oriented frontage compatible with the surrounding residential context while improving long-term flexibility.

The current 10' ceiling height fully accommodates live-work functionality and meaningful street activation. Increasing ceiling heights to 11' or 12' would introduce significant structural, mechanical, and design impacts within the wood-frame system. Live-work is fully accommodated at 9' ceilings; BCBC residential minimum is 2.3m (7'-6") and 9' is consistent with successful live-work precedents across the region.

Importantly, additional ceiling height alone would not create realistic commercial convertibility. The units remain fully integrated within the residential floor plate and do not include the servicing, egress, loading, accessibility, or separation requirements necessary for future Group D or E occupancy under BCBC Part 3.

Further, the subject frontage is not identified within applicable policy as a required commercial frontage. Commercial activity is generally directed toward Fort Street and internal circulation areas within the adjacent shopping centre.

Foul Bay Road at this location also lacks characteristics typically associated with viable retail frontage, including:

- continuous storefront presence;
- on-street parking or loading;
- a pedestrian-oriented retail environment; and
- strong commercial visibility.

The proposal therefore achieves the intent of active frontage through enhanced ground-oriented residential design and future adaptability, while avoiding costly commercial-grade requirements for isolated units in a location where long-term retail viability is uncertain.

The project delivers 100% purpose-built rental housing, directly supporting provincial and municipal housing priorities. Compromising three rental units to accommodate speculative commercial flexibility would impose permanent cost and design impacts for a use with no demonstrated demand and, due to the code and configuration constraints noted above, no realistic path to future conversion.

Below-Grade Design, Landscape, and Stormwater Response

In response to staff comments, the project has reduced the parkade footprint to improve landscape opportunities, soil volumes, and stormwater performance.

The revised design includes:

- enhanced frontage landscaping and tree planting;
- improved soil volumes;



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- replacement tree planting; and
- a surface-based rain garden stormwater strategy.

The previous underground detention system has been removed in favour of integrated green infrastructure that better supports Bowker Creek watershed objectives and public realm improvements.

Further reductions to the parkade would materially impact parking provision, building efficiency, and project viability. The current design reflects a balanced response within site constraints, including the required 3.0 m road dedication.

Contiguous Landscape Area

The Zoning Bylaw defines *Contiguous Landscape Area* as a continuous landscaped area without underground structures (such as parkades), with natural ground cover, and set back a minimum of 1.0 m from both property lines and subsurface structures.

The project currently provides approximately 46 m² of contiguous landscape area, resulting in a shortfall of approximately 110.6 m². However, the required 3.0 m road dedication along Foul Bay Road removes approximately 110.6 m² from the site and is the primary reason the project cannot fully meet the landscaped area requirement at grade.

In response, the proposal includes:

- enhanced frontage landscaping;
- approximately 3,000 SF of extensive green roof;
- ground-level outdoor amenity and landscaped open space;
- private patios; and
- direct integration between indoor and outdoor amenity areas.

The extensive green roof, while not currently illustrated on the drawings, is accepted by the applicant as a condition of approval. This approach provides meaningful environmental benefits, including stormwater management, additional planted area, and urban heat island reduction.

Amenity Location

We acknowledge that the outdoor amenity courtyard is located north of the building and is not ideal from a pure solar orientation perspective. However, the selected location provides several important functional and livability benefits that strongly support the proposed design.

The outdoor amenity area benefits from:

- acoustic separation from Foul Bay Road traffic;
- increased resident privacy, with the courtyard shielded from public view, which is appropriate for residents using the outdoor amenity;
- natural surveillance from surrounding units consistent with CPTED principles;
- direct and seamless access from Corridor 100 and Indoor Amenity Room 116;
- family-friendly ground-level accessibility; and
- a sheltered microclimate protected from prevailing winds along the Foul Bay corridor.

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Collectively, these characteristics create a comfortable, secure, and functional outdoor amenity environment that is well integrated with the overall residential program.

Rooftop Amenity Trade-Off and Amenity Strategy

A rooftop occupiable amenity space was carefully reviewed but is not proposed due to structural, life safety, height, and cost implications.

The building's structural system is calibrated to meet seismic requirements under the 2018 BC Building Code and updated Site Class D geotechnical conditions. Rooftop occupancy would require significant structural upgrades, elevator extension, additional life safety measures, and further height beyond the proposed variance. These conclusions are consistent with the attached Structural Letter of Opinion prepared by WHM Structural Engineers (dated May 29, 2026).

Given the substantial cost and limited practical use typically associated with rooftop amenities in purpose-built rental projects, the proposal instead prioritizes accessible and functional indoor and ground-level amenity spaces.

Rooftop amenity would introduce substantial additional loads associated with:

- hardscape and paving;
- landscaping and soil;
- guardrails and rooftop structures; and
- occupant use and associated live loading.

Even a modest rooftop amenity program could exceed available structural capacity and require significant compensatory measures, including structural strengthening or reductions elsewhere within the building.

In addition, rooftop programming would require:

- extension of elevator service to the roof level;
- additional stair and life safety provisions;
- modifications to the roof assembly and building envelope;
- redesign of structural, mechanical, and building systems; and
- substantial increases in construction cost.

The building height already requires a variance from the 14 m by-right standard, and a code-compliant occupiable rooftop with guardrails and weather protection would require additional height beyond what is currently proposed.

Collectively, these requirements would materially impact project viability.

The project team also notes that rooftop amenities within purpose-built rental projects are often significantly underutilized relative to their cost and complexity. As a result, the project prioritizes investment into high-quality, accessible indoor amenity and ground-level outdoor amenity spaces that provide more practical day-to-day use for residents.

In this context, the proposal delivers a comprehensive and site-appropriate amenity package



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through:

- indoor amenity space directly connected to outdoor space;
- ground-level outdoor amenity;
- extensive green roof area;
- landscaped open space;
- private patios; and
- active transportation amenities.

This approach supports resident livability while balancing structural feasibility, long-term functionality, sustainability objectives, and overall project viability.

Climate Forward Features and Sustainability

The project is proposed to meet Step Code 3 and Zero Carbon Energy Step Code 4 standards.

Additional sustainability measures include:

- energy-efficient mechanical systems;
- passive solar shading;
- mechanical cooling for indoor comfort and wildfire smoke resilience;
- sustainable material and waste reduction practices;
- pollinator-friendly native and adapted landscaping; and
- enhanced tree planting and soil volumes.

Transportation and Infrastructure

The site is well-served by walking, cycling, transit, and vehicle infrastructure. The proposal includes secure bicycle storage, repair facilities, EV-ready infrastructure, and improved pedestrian connectivity.

The site is also within close walking distance of grocery stores, schools, recreation facilities, Royal Jubilee Hospital, and daily services, making it well suited for purpose-built rental housing.

Parking Variance

Schedule C of the zoning bylaw requires 73 residential stalls and 9 visitor stalls (82 stalls in total). The proposal provides 61 total stalls, including 54 residential and 7 visitor spaces.

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Required									
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To support urban forest retention, stormwater objectives, and project viability, the parkade is limited to a single underground level and avoids extending to the north, east, and west property lines to protect critical root zones.

The reduced parking supply is supported by the site's highly accessible location and provision of 108 long-term and 8 short-term bicycle parking spaces.

Overall Project Approach

The proposal reflects a thoughtful and balanced response to staff direction. The project team has made meaningful revisions to improve alignment with City objectives while recognizing practical site, structural, and financial constraints.

The remaining items represent site-specific trade-offs rather than omissions. Additional requirements such as commercial-grade ground-floor construction or rooftop occupiable amenity would introduce disproportionate impacts relative to the public benefit achieved in this context.

Conclusion

The proposed development represents a balanced and context-responsive approach to delivering purpose-built rental housing within the Jubilee Town Centre.

The project advances City objectives by:

- contributing to rental housing supply;
- supporting a pedestrian-oriented public realm;
- improving landscape and environmental performance; and
- responding meaningfully to staff feedback.



We respectfully request Council's support for the proposal and appreciate the opportunity to continue working collaboratively with the City as the project advances.

Yours Truly,

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