

April 20, 2026

City of Victoria
1 Centennial Square
Victoria, B.C. V8W 1P6
p
Attn: Mayor and Council

Re: RZ DP Resubmission Project Summary and Rationale Letter - 441, 443 Government Street and 605, 607 Michigan Street

Hello Mayor Alto and City of Victoria Council Members

We are pleased to resubmit our updated and substantially redesigned Rezoning and Development Permit application for the redevelopment of 441 and 443 Government Street and 605 and 607 Michigan Street, located within the City of Victoria's James Bay neighbourhood. We recognize the significance of this site within one of Western Canada's oldest and most vibrant communities and have approached the redevelopment with care and respect for its unique context.

The concept for the site is to consolidate two existing duplex lots to permit a new six storey multifamily development. Our application is guided by the City of Victoria's recently updated Official Community Plan (OCP) and updated Zoning Bylaw 2018, the Province of British Columbia's Transit Oriented Area (TOA) Policy, City of Victoria Design Guidelines, as well as the established and emerging development patterns within the James Bay Neighbourhood.

Our proposal reflects a comprehensive and thoughtful approach, incorporating detailed site analysis, review of precedent developments nearby in James Bay, alignment with the City's updated land-use policies, and meaningful engagement with neighbours and local stakeholders. We are committed to designing a development that respects the neighborhood's heritage while meeting the evolving housing needs of the community.

Project Overview

Our vision is to deliver 52 new condominium homes within a thoughtfully designed six-storey, multi-family residential building that responds to its urban context while contributing positively to the James Bay neighbourhood.

The land use policy framework in the City of Victoria has evolved significantly since we submitted our initial Rezoning and Development Permit application. In the Fall of 2025, the City adopted a new Official Community Plan Victoria 2050 (OCP), and concurrently advanced the Zoning Bylaw 2018 modernization, which rezoned large portions of the city, including the subject property. Collectively, these updated policy directions provide strong support for the form and scale of development we are proposing on this site.

At the OCP level, the subject site is now designated as a Priority Growth Area. This designation is intended to accommodate intensive, primarily residential infill development in locations that are within walking distance of Town Centres and Community Villages, and immediately adjacent to Transit Priority Corridors. The OCP also supports Victoria's continued role as a destination city through the retention, enhancement and addition of tourism assets, like hotel accommodation, particularly in and around the iconic Inner Harbour. Given the proximity of our site to the Inner Harbour and the current market conditions, we feel that including Strata Hotel use will help achieve this goal and is also necessary for the project's viability. The proposed development is consistent with these policy directions and aligns with the OCP's objectives for directing growth to well-served urban locations.

At the zoning level, the properties are also now within the General Residential District–1 (GRD-1) Zone, which is a medium-density, primarily residential zone intended to support a wide range of housing types, including multi-family infill buildings up to six storeys in height. The proposed built form reflects the intent of this updated zoning framework and responds to the neighbourhood’s evolving development context and the City of Victoria’s need for more diverse housing options.

In addition to these municipal policies, the Province of British Columbia has recently introduced several land use initiatives aimed at increasing housing supply. Notably, Bill 47: Housing Statutes Amendment Act promotes new housing development in areas that are well served by transit. Our Surveyor has confirmed that the subject site is located within the Legislature Exchange Transit-Oriented Area (TOA), which establishes a minimum allowable building height range between six to ten storeys. The proposed six-storey development is consistent with this provincial policy direction and supports the provision of sustainable, transit-accessible housing.

From a zoning perspective, the proposal will still require a rezoning approval. Specifically, the application seeks approval for density beyond what is contemplated in the updated GRD-1 zoning and is also requesting a ‘Strata Hotel’ use. As such, we are respectfully requesting that Mayor and Council approve a site-specific zoning amendment to enable our proposed development.

Community Engagement Overview

Since acquiring the properties in May 2024, we have undertaken ongoing community engagement efforts with the James Bay Community Association through the CALUC engagement process, as well as through direct in person meetings with our immediate neighbours. We have also met with the City of Victoria’s Planning and Development Team. The feedback received through these discussions has meaningfully informed the project, and the design has been refined to reflect community interests and priorities wherever feasible. We are committed to continuing our community engagement with these important stakeholders should the project be approved by Mayor and Council.

Design Considerations

The proposed development offers a design that provides much-needed housing options in James Bay and minimizes impact to surrounding single family homes and heritage structures. However, we acknowledge that the design does differ from some of the City of Victoria Staff’s application review feedback. We believe that there are three important design considerations that warrant closer examinations and reveal several challenges:

- **Parkade Access and Retention of Copper Beech Boulevard Tree M1 (Municipal tree #14506)**

During the initial pre-application review, City of Victoria Parks staff identified Municipal Tree #14506, a Copper Beech boulevard tree (referred to as M1 by our project arborist), as a high-value tree and expressed a strong preference for its retention. At that time, the pre-application drawings indicated that removal of the tree would be required to accommodate the proposed parkade design, as a detailed root zone investigation had not yet been undertaken.

Following this feedback, we reduced the proposed extent of the parkade and our project arborist completed on-site exploratory root mapping for the subject tree in March 2025. The root mapping investigation concluded that with the reduced parkade extent the M1 tree can be retained as the tree’s critical root zone does not appear to extend significantly into the revised parkade footprint. Achieving the reduced parkade extent is contingent on the vehicular access being relocated to Government Street.

As a result, the updated design submitted with this resubmission has been specifically refined to enable the successful preservation of the existing M1 Copper Beech tree.

- **TOA, Floor Space Ratio and Flexible Use**

The subject property is situated within the 400-metre tier of the Legislature Transit-Oriented Area (TOA), as designated by the Province of British Columbia and now incorporated into the City of Victoria’s updated Zoning Bylaw 2018. The TOA designation allows for a minimum building height of six storeys and a minimum Floor Space Ratio (FSR) of 2.5. To enhance the livability of each home in the proposed development, we are proposing an overall FSR of 3.2. This is the minimum density required for a viable development and prioritizes the delivery of new, highly livable housing in this central, transit-oriented, and amenity-rich location.

It is also noted for context that, had the subject property been located just 0.57m or less than 2 feet closer to the TOA coordinate at the Legislative bus loop, it would fall within the 200-metre tier, where a higher minimum density is permitted than what is proposed. This underscores that the proposed height, use, and density are reasonable and appropriate for this location.

- **Young Street Dedication (SRW)**

Before acquiring the subject property, City of Victoria Staff identified the need to widen Young Street to improve safety for pedestrians, cyclists, and vehicles. As a result, either a dedication or a statutory right of way (SRW) would be required. In response, we initially proposed an at-grade SRW along the Young Street frontage, with a portion of the underground parkade extending below grade into the frontage. However, City of Victoria Transportation Staff later clarified that a dedication would be necessary, and that projections into the Young Street frontage would not be permitted.

While challenging due to the small size and irregular geometry of the property, we have substantially redesigned our proposed development to provide the requested dedication on Young Street. No portion of the proposed below grade or above grade structure will project into the new Young Street dedication. While the City of Victoria does not require off-street parking for developments located within the Legislature TOA, we believe it is essential for our project to provide an adequate amount of on-site parking. This will not only meet the needs of future residents but also ensure that the development does not have negative impacts on the surrounding neighborhood.

Creating New Housing Options

The project will be comprised of 52 new homes ranging from Junior One-Bedroom condo homes to Three-Bedroom condo homes oriented towards families and larger households. The development will feature a diverse mix of homes, with a focus on family-sized units and varied housing options.

The full unit mix breakdown can be seen below:

	Number of Homes	Unit Mix
Junior 1 Bedroom	18	35%
Junior 2 Bedroom	12	23%
2 Bedroom	14	27%
Junior 3 Bedroom	4	8%
3 Bedroom	4	8%
Total	52	100%

Not including the Junior 2 Bedroom homes, 42% of the proposed homes are designed as family-sized units and each residence features a large private outdoor space.

General Urban Design Guidelines

The City of Victoria's new General Urban Design Guidelines (GUD) apply to our subject property. The GUD guidelines place a strong emphasis on creating a perimeter block form over time. This urban design model prioritizes buildings with a front-to-back orientation, siting proud to the street, and substantial rear yard setbacks.

The subject property is relatively small and has an irregular geometry. In addition, the subject property has three street frontages, Government Street, Michigan Street and Young Street, which results in the rear yard being defined along the south edge of the site. Due to these constraints, it is not possible to achieve a perimeter block form of development. Instead, our focus has been on creating a new signature development that will act as a new gateway into James Bay. Additionally, the proposed building setbacks and the reduced upper levels have been carefully designed to integrate seamlessly with the surrounding neighborhood, ensuring compatibility with the existing urban fabric.

The James Bay neighborhood features a blend of historic and contemporary structures, including landmarks such as the City of Victoria's Fire Station Number 2, low-rise single-family homes, small-scale commercial spaces, and multi-family residential and office buildings of varying heights. Nearby developments include Duet by Chard Development, with four-storey and eight-storey buildings across Michigan Street at 640 Michigan, and Capital Park by Jawl and Concert Properties, which combines new construction with restored heritage structures up to five storeys. Additionally, high-rise buildings like Orchard House at 647 Michigan Street and Robert's House at 620 Toronto Street contribute to the architectural diversity of the area.

Our proposed six-storey development is designed to harmonize with this eclectic context through calibrated urban design, architecture, and landscape integration. To create a visual connection to the local heritage, prominent elevations will feature brick masonry cladding, inspired by structures like Fire Station Number 2. During our first CALUC engagement session, several neighbors expressed concerns that the red brick cladding appeared too dark and severe. In response, we carefully reviewed this feedback with our Project Architect, and as a result, we are now proposing a lighter brick cladding with more traditional brick detailing. We believe these modifications will enhance the design and contribute positively to the streetscape, adding a textural element that enriches the surrounding environment.

The main building entry is located on Michigan Street, directly across from the 'pocket park' bench seating outside the Birdcage Confectionary. The building's design features a prominent entry canopy, traditional brick detailing and an upper storey set back from the lower levels. This approach, combined with large balconies and expansive openings, articulates the building form while ensuring ample natural light in every home.

Ground-floor homes include spacious private outdoor patios that are slightly separated from the adjacent sidewalk and public realm by layered landscape plantings, offering privacy and an enhanced connection to nature. Creating a sense of community is also important and a communal, roof top amenity space provides a place for residents to gather.

Public Realm and Landscape

A key goal of this project is to create a dynamic, well-connected streetscape that prioritizes accessibility, sustainability, and shared experiences and offering opportunities for engagement, and connectivity for residents of all ages and backgrounds. Ground floor patio homes will have direct access to the sidewalk, which will help activate the public realm. Young Street will be improved and enhanced with a 2.16m dedication, and we will continue the City of Victoria's investment in bicycle infrastructure on Government Street and Michigan Street. Landscape boulevards will include four new boulevard trees as well as several retained boulevard trees. Additional on-site landscape plantings will also enhance the public realm on all frontages including five new on-site replacement trees and a total of seven new on-site trees.

Bicycle Infrastructure and Alternate Transportation Options

Due to the proposed development's location within the Legislature TOA, we are not required to provide any on site residential parking. That said, we are committed vehicle parking in a below grade parkade structure to ensure that we do not negatively impact the surrounding neighbourhood and to make sure that adequate parking is provided.

We are also thrilled to offer a range of Transportation Demand Management measures. Our proposed development includes convenient access to sixty-four (64) long term bike parking spaces which exceeds the City of Victoria Bylaw requirements. In addition, we propose to provide BC Transit one year bus passes to all homeowners who purchase a unit without parking, and who wish to receive a pass. We believe that the enhanced bike parking facilities and the ongoing investment in transit infrastructure in Greater Victoria, and the connectivity to bus routes in James Bay will make this an attractive option for those purchasing a unit without parking and who enjoy a car-free lifestyle.

Green Building Features

The proposed development will meet Step 3 of the BC Energy Step Code, the provincial standard for sustainable and energy-efficient buildings. If our proposed development is approved by Mayor and Council, we will collaborate with the Architect, Energy Modeler and other Engineering Consultants during the Building Permit application process to ensure these standards are met or exceeded. The design of the building envelope will incorporate best practices with the use of high-quality, sustainable materials to ensure durability and long term performance.

In addition, the project will adhere to Emissions Level 4 of the BC Zero Carbon Step, with electric systems for both domestic hot water heating and space heating to reduce GHG emissions. To address recent Building Code changes and the potential for increasing seasonal weather extremes, each home will be equipped with a heat pump for both heating and cooling. The inclusion of heat pumps will enhance occupant health and comfort.

The application will also meet the City of Victoria's bylaw requirement for all parking spaces to have access to Level 2 energized outlets, facilitating future installation of electric vehicle chargers.

Sustainable landscape design is another key feature of this project. New boulevard street and on-site trees will enhance privacy and shade during summer months while providing opportunities for wildlife habitat. An on-site stormwater management system will capture, clean, and release stormwater into public infrastructure to mitigate potential impacts.

CONCLUSION

This proposed six-storey multi-family residential development will contribute to addressing the City of Victoria's urgent housing needs while aligning with the James Bay neighbourhood's character and vision. Through innovative design, environmental sustainability, and community engagement, this project supports the City's commitment to balanced and sustainable growth.

We look forward to advancing this proposal through the rezoning and development permit process and continuing meaningful collaboration with the City of Victoria and local community members.

Best regards



Nicholas Standeven
Vice President of Development