



**MAKOLA  
DEVELOPMENT  
SERVICES**

June 11, 2025

City of Victoria  
1 Centennial Square  
Victoria, BC V8W 1P6  
VIA ELECTRONIC DELIVERY

Attention: Mayor Alto and Council

**Re: Rezoning Application – 3075 Douglas Street, Victoria**

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Dear Mayor Alto and Council,

On behalf of M'akola Housing Society, M'akola Development Services is pleased to submit this Application for Rezoning for our Indigenous, mixed-use development at 3075 Douglas Street in the Burnside Gorge neighbourhood. This proposal includes 208 units of rental housing and over 6,000 sqft of commercial space. The property was recently purchased by M'akola Housing Society, a non-profit housing provider with extensive experience operating affordable housing across British Columbia. M'akola Development Services will be acting as the project lead for this development.

M'akola Development Services is requesting approval for the following:

- A Zoning Bylaw amendment to rezone the subject sites from **C1-Ca Limited Casino Commercial District** to the **Comprehensive Development (CD-site specific) Zone**.

This letter serves as an introduction to the application package, and includes the following details:

- Project Summary
- Amendment to the Zoning Bylaw
- Compliance with Community Plans
- CALUC Meeting
- Project Funding and Financing
- Closure

Thank you for your consideration.

Sincerely,

**Holly Pridie, RPP, MCIP**

Project Manager | M'akola Development Services

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Attachments:

1. Application Form for Rezoning
2. Letter of Owner Authorization
3. Set of Plans, including:
  - a. Site Plan
  - b. Landscape Plan
  - c. Survey Plan
  - d. Floor Plans
  - e. Elevations
  - f. Cross Sections
  - g. Building Elevations and Streetscape Plan
4. Sanitary Sewage Attenuation Report
5. Transportation Impact Assessment
6. Parking and Transportation Demand Management Study
7. Title Search
8. Archaeology Data Report

## 1. PROJECT SUMMARY

M'akola Housing Society is proposing to develop a 23-storey, 208-unit rental housing development for Indigenous families, individuals, and Elders, with one level of underground parking, and surface parking at 3075 Douglas Street, Victoria. This proposed development will provide a mix of studio, one-bedroom, two-bedroom, and three-bedroom homes, with an emphasis on culturally appropriate larger units that encourage intergenerational living. The ground floor will include 6,232sqft of commercial space, a residential lobby, residential cargo bike storage and bike workstation. Additional standard bike storage is proposed on the mezzanine level of the development, accessed by an elevator.

This project responds to a clearly demonstrated need and demand for Indigenous rental housing in Victoria. There is significant lack of new independent, family-oriented, Indigenous housing in the City, underscoring a critical gap in the local housing supply. This project addresses a critical need without displacing any existing residential tenants. The proposed development incorporates ample outdoor space, including a plaza on the corner of Douglas Street and Finlayson Street, landscaped street frontages, and a large, landscaped courtyard on the second floor for residential use and enjoyment. This development will also include culturally significant Indigenous-designed artwork that provides visual interest through variation in the design and articulation of the tower façades. North and south elevations will incorporate Indigenous artwork with the east and west elevations showcasing a wave pattern. A significant public art piece (the trigon) will be located on the corner of Douglas and Finlayson Street and the second-floor amenity space will be framed by a Longhouse parapet design. These interventions create a culturally significant and unique building design.



Figure 1: Rendering of the proposed development from the corner of Douglas and Finlayson Street

## 1.1. SITE CONTEXT

The subject site is located at 3075 Douglas Street, Victoria, within the Burnside Gorge Neighbourhood Plan. This site is close to an abundance of services, amenities, transportation options, and parks which encourage healthy living, community connections, and support overall tenant wellbeing.

The subject site is also situated directly across from Mayfair Mall and is located within 2km of the downtown Victoria core, recreation centres, grocery stores, secondary and elementary schools, and Uptown Centre. There are several major BC Transit routes on Douglas Street and Finlayson Street, including RapidBus and BC Ferries Connector Stops. Nearby active transportation options include shared and AAA (All Ages and Abilities) bike lanes, and the Galloping Goose regional trail. Refer to Table 1 below for additional site details.

**Table 1: Site Details**

Site Details	
<b>Site location</b>	3075 Douglas Street
<b>Legal description</b>	LOT 1, SECTION 4, VICTORIA DISTRICT, PLAN 13031 PID 004-698-452
<b>Current registered owner</b>	M'akola Housing Society
<b>Surrounding land use</b>	Commercial, Retail, General Employment
<b>Proximity to public transportation</b>	Bus stop = <50 m; airport = 23 km
<b>Proximity to public amenities</b>	Library = 1.7 km; park = 0.5 km
<b>Proximity to commercial services</b>	Grocery store = 1.2 km; bank = 0.4 km; fitness centre = 0.8 km; shopping centre = 0.1 km
<b>Utilities</b>	All utilities available

## 1.2. ABOUT THE OWNER AND OPERATOR

M'akola Housing Society (MHS) is a non-profit organization based in Victoria with over 40 years of experience providing safe, affordable, and high-quality rental homes for Indigenous Peoples. MHS's current housing portfolio includes over 2,000 units in communities across British Columbia, and more than 600 in the capital region.

Victoria continues to experience a rise in housing costs, which has resulted in increases to housing insecurity and homelessness. Based on 2016 data, 30% of Indigenous households in Victoria are in Core Housing Need compared to 21% of non-Indigenous households. Both figures exceed average rates of Core Housing Need in the CRD, BC, and Canada. As of 2020, 1,523 people were experiencing homelessness in Victoria, with the most prevalent demographics being Indigenous People, women fleeing violence, families with children, youth under the age of 25, and youth leaving ministry care.

There is an immediate need to diversify housing options in Victoria—an estimated 11,300 dwellings are needed by 2041 to accommodate projected household demand. This includes more housing for low to moderate income families, Indigenous Peoples, people with disabilities, immigrants and refugees, and individuals and families leaving transitional or supportive housing. As of April 2024, BC Housing’s waitlist for homes in Victoria currently has 1,486 applicants, with largest need being seniors (503), families (328), and people with disabilities (315).

This project leverages the depth and breadth of M’akola’s experience, as both a housing developer and provider, to address growing challenge of affordable housing in Victoria. MHS brings the following to the project:

**Extensive experience and capacity.** MHS has over 40 years experience in housing operations and asset management. MHS possesses mature operating infrastructure and successfully operates affordable Indigenous properties across the province.

**Critical need and demand and high degree of impact.** The need for affordable, suitable, and safe housing for Indigenous families is well documented. As per their mission, MHS will prioritize Indigenous tenants in this building thereby reducing some of the need and demand in the area.

**Advancement of Truth and Reconciliation.** As demonstrated in this proposal, the project will honor and promote local Indigenous culture and support the Calls to Action from Canada’s Truth and Reconciliation Commission.

M’akola Housing Society and the City of Victoria have an established relationship centered around shared goals of expanding affordable, Indigenous, and family-friendly housing options in the region. Forty percent (40%) of the proposed homes in this project are two- and three-bedroom units, which are suitable for families. The public benefit associated with this unit mix is indisputable as recent reports indicate a near-zero vacancy rate and low construction rate for units of this size over the past five years. The location of the proposed development is also highly suitable for families due to the proximity to rapid and frequent transit routes, parks, recreation centres, schools, and numerous other services and amenities.

## 2. AMENDMENT TO THE ZONING BYLAW

The subject site is currently zoned as C1-CA Limited Casino Commercial District, which permits a range of uses such as Class 1 Casino, chartered banks, offices and professional businesses, mixed residential uses with ground floor commercial, retail, and restaurants. M’akola Development Services is requesting to rezone the subject site to a **Comprehensive Development (CD-site specific) Zone** to allow for the residential and commercial uses and density levels as outlined in Table 2.

M’akola Housing Society is actively exploring the commercial potential of the site, taking into account structural feasibility and market viability. As feasibility studies are ongoing, the uses and

commercial tenants may shift. Accordingly, M'akola Housing Society is seeking flexibility in the zoning bylaw to allow for several potential commercial uses as planning progresses.

**Table 2: Proposed Zoning**

Proposed Comprehensive Development Zone		
<b>Permitted Uses</b>	<ul style="list-style-type: none"> <li>• Mixed Use Residential</li> <li>• Offices</li> <li>• Medical Offices</li> <li>• Personal Services</li> <li>• Professional Businesses</li> <li>• Financial Services</li> <li>• Restaurant</li> </ul>	<ul style="list-style-type: none"> <li>• Retail</li> <li>• Grocery Store</li> <li>• Institutional</li> <li>• Arts and Culture</li> <li>• Health and Fitness</li> <li>• Care Facility</li> </ul>
<b>Maximum Lot Coverage</b>	70.73%	
<b>Maximum Density</b>	5.58	
<b>Maximum Height</b>	76.21 m (23 storeys)	
<b>Minimum Front Yard Setback (North)</b>	4.2 m	
<b>Minimum Rear Yard Setback (South)</b>	2.51 m	
<b>Minimum Side Yard Setback (East)</b>	3.05 m	
<b>Minimum Side Yard Setback (West)</b>	0.67 m	
<b>Parking Variances</b>	<ul style="list-style-type: none"> <li>• Variance of 65 Residential Parking Stalls</li> <li>• Variance of 12 Commercial Stalls</li> <li>• No Variance for Bicycle Parking</li> </ul>	

## 2.1. GENERAL DESIGN

Design of the form and character will be further progressed and confirmed upon development permit application. Preliminary design intent and features are included as context for this rezoning application. This is not a development permit application.

- MHS is proposing a 23-storey tower landmark building that will mark the entrance to the Douglas Corridor and the City of Victoria.
- The project will feature Indigenous art, including a trigon at the main entrance that will be visible from the intersection of Douglas and Finlayson Streets. The trigon holds cultural significance, provides weather protection, and preserves key sightlines.
- Indigenous artwork is planned for the north and south façades, with wave-patterned building design on the east and west façades. The artwork design on the north and south façades incorporates a central circle with crescents radiating outward, similar to the rippling effect of a drop of water. This design carries cultural meaning and is being developed in collaboration with local Nations.
- A culturally appropriate Longhouse-inspired parapet design surrounds a generous second-level outdoor amenity space. This design acts as a sound barrier, enhances the vertical

expression of the podium, and supports social interaction, play, and urban food production. The amenity space includes seating nooks, a play area, and a communal garden.

- Building articulation is achieved through varied massing and material use.
- The residential ground-floor entrance on Finlayson Street is bordered by soft landscaping.
- Ground-level bike storage allows easy street access, supplemented by a bike elevator for mezzanine-level storage.
- The Douglas Street frontage is activated with commercial entrances, bike parking for customers, and canopies for weather protection.

## 2.2. INDIGENOUS DESIGN AND PUBLIC ARTWORK

M'akola Housing Society has engaged Indigenous Artist and Designer Connie Watts to lead the design and coordination of the Indigenous design elements and public art pieces proposed for this development. Please refer to the Artist Statement below for the significance of the design.

**Artist/Designer: Connie Watts**

**Date: May 22, 2025**

**Artist's Statement:** Respect is the guiding force for the 3075 Douglas Street building project's art and design. As a Nuu-chah-nulth, Gitxsan and Kwakwaka'wakw artist and designer, I wanted to honour our old ways of our artists traveling distances to come together to share knowledge, ways and our creative gifts. I will be working with Butch (Clarence) Dick of the Songhees Nation, to create the final art held within the prominent building shapes: the circles; crescents; and trigon. This project centres on leading with respect and working together; this is what is at the centre of our First Nations' potlatching communities.

The circle design with crescents moving out from the center is like a drop of water that ripples out. Water connected us. It was our strength used for healing, providing a wealth of food and ease of traveling. The extension of circle to the three crescents on the top and bottom honours this vast connectivity of our water and waterways. The design is repeated on both the south and north side visual showing the movement of our travels up and down the coast and symbolizes the robustness of water as a central part of our First Nations' histories, culture, and livelihood.

Welcoming you into the building is the trigon. It's four points, the three surface points and a fourth inner point represent the four parts of human nature: the physical; the mental; the emotional; and the spiritual. Four is an important ritual number and is central to our teachings. In our cultural ways, everything is alive, including what we create. With this in mind, all the artistic designs are like beings that are honouring the local Nations, our First Nations' histories and bring respect and good energy to the building residents.

## 2.3. CLIMATE CHANGE AND SUSTAINABILITY

- The project will be built to BC Step Code 2 or higher, incorporating cooling for thermal comfort.



- Building features include high performance glazing, airtight building envelope, and LED fixtures throughout.
- Boulevard trees and landscaping will enhance biodiversity and support native and pollinator plantings.
- Rain gardens will be installed for on-site stormwater management.
- Low maintenance, native species will be featured in landscaping to minimize the need for watering and chemical treatments.

## 2.4. TRANSPORTATION AND PARKING

The site is well-served by multimodal transportation options. Along Douglas Street, a RapidBus route and access to the BC Ferries Connector Bus provide frequent and convenient transit connections. Adjacent to Finlayson Street, there is additional frequent transit service, with four bus stops located within 200 metres of the site. The area is also supported by shared and AAA (All Ages and Abilities) bike lanes, further enhancing accessibility by active transportation. (See Attachment 5: Traffic Impact Assessment.)

The proposed development includes one level of underground parking with 57 vehicle stalls for the residential units, accessed from Larch Street. Surface parking, also accessed from Larch Street, will include 15 stalls shared between commercial use and residential visitor parking after business hours. Signage will be installed to manage the shared uses. Two designated loading stalls are also provided (See Attachment 6: Parking Study). The study outlines transportation demand management (TDM) strategies that support a parking variance. Based on M’akola Housing Society’s extensive experience operating affordable rental housing, parking uptake is typically lower in developments located near transit, services, and schools compared to what standard bylaws require.

The project also includes robust active transportation support, with 237 long-term and 28 short-term bicycle parking spaces.

## 2.5. INFRASTRUCTURE

The project team is actively working with City staff to assess infrastructure capacity and determine any necessary requirements. We propose a frontage design that complies with bylaws, including a continuous sidewalk along Larch Street, as discussed during pre-application meetings. Please refer to Attachment 4 for the preliminary sanitary sewage attenuation report.

# 3. COMPLIANCE WITH MUNICIPAL PLANS AND POLICY

## 3.1. OFFICIAL COMMUNITY PLAN

The proposed development complies with the City of Victoria’s Official Community Plan (OCP) and the Downtown Core Area Plan (DCAP). Although the subject site is not located within the Downtown



Core, the proposed development is subject to Appendix 4: Design Guidelines, Section 6 Tall Buildings.

The OCP situates the subject site within the Town Centre Urban Place Designation, and on the edge of General Employment. The Town Centre is envisioned as a vibrant, transit-supportive hub characterized by low- to mid-rise buildings accommodating a diverse mix of uses. Built form may include multi-unit residential, mixed-use, and freestanding commercial buildings, with heights generally ranging from four to ten storeys, depending on the surrounding context and as guided by local area plans.

Permitted land uses within the Town Centre include residential, mixed-use, commercial (such as office, destination retail, and visitor accommodation), as well as live/work and home occupations. The designation also emphasizes a high-quality public realm, featuring wide sidewalks, regular street tree plantings, and buildings set close to the street frontage. Town Centres are typically anchored by a full-service grocery store or an equivalent mix of food and destination retail and serve as hubs for frequent or rapid transit.

While the proposed project exceeds the specified density typically envisioned for the Town Centre designation, the OCP permits departures where significant public benefits are provided, such as non-market housing. In this case, the proposal delivers meaningful public benefit through the provision of non-market housing. As such, City of Victoria Planning Staff have indicated that an OCP amendment is not required.

The following OCP Land Management and Development policies (page 40) further support the proposed development:

**Item 6.8:** Where a site or area is providing primarily non-market housing, achieving (*sic.*) heritage conservation objectives, or other significant public benefit, development can depart from the guidelines established for Urban Place Designations, if the development is consistent with City policies, good urban design principles, and the objectives of this plan, and is responsive to the envisioned context of the surrounding area.

**Item 6.9:** Site specific development can depart from the guidance established for Urban Place Designations if the development goes through a rezoning, is supported by the local area plan, is consistent with City policies, good urban design, good urban design principles, and the objectives of this plan, and is responsive to the envisioned context of the surrounding area.

### **Alignment with OCP Objectives**

The proposal supports several key goals of the OCP, including:

- Accommodating population growth in or near Town Centres.
- Focusing on new growth along the Douglas Street Corridor and linking land use changes to the planning and implementation of Rapid Transit (S21.2.2, p. 170).

- Working in partnership with senior levels of government for the provision of non-market housing.
- Supporting a range of housing types and tenures across the city and within neighbourhoods to meet the needs of residents at different life stages, household compositions, and abilities.
- Encourage partnerships that address the need for affordable non-market housing for households with children.
- Recognizing Douglas Street as a significant transportation corridor that serves all transportation modes such as pedestrians, cyclists, public transit passengers and vehicles (p. 221).
- Achieve a unique character and sense of place in the design of each Town Centre through high quality architecture, landscape and urban design with the inclusion of new landmarks.
- An emphasis on establishing housing units directed toward specific groups in core need.
- Encouraging buildings adjacent to sidewalks to maximize entrances at ground level to support active land uses and provide interest for pedestrians.
- Integrate off-street vehicle parking in a way that does not dominate development or streetscapes.
- Reduce greenhouse gas emissions through compact land use patterns, high building performance measures for new building construction, and the BC Step Code.

### **Alignment with DCAP Objectives**

Although the proposed development is outside of the Downtown Core, the project aligns key DCAP Tall Building Design Guidelines, including:

- Providing visual interest through variation and articulation of tower façades for buildings over 36 m.
- Maintaining a minimum 3 m tower setback from the street wall.
- Including canopies to reduce pedestrian-level wind impacts.
- Differentiating the building base with Indigenous design elements like the trigon and longhouse details, and shared amenity spaces on the second level.
- Delivering a high-performance, human-scale building that supports pedestrian activity and resident livability.

Overall, the proposed development is well aligned with the OCP's policy direction, including its land use, urban design, and sustainability principles. It also responds to DCAP guidance for tall buildings and delivers significant public benefit in the form of non-market housing, confirming its consistency with both policy frameworks.

### **3.2. BURNSIDE GORGE NEIGHBOURHOOD PLAN**

M'akola Housing Society's proposed development is well-aligned with the vision and objectives of the Burnside Gorge Neighbourhood Plan (2017). The site is located within the Mayfair Town Centre, a designated sub-area of the Douglas Corridor, which is identified as a priority location for growth,

revitalization, and transit-oriented development. As part of this broader mixed-employment area stretching along Douglas Street to Blanshard Street, the site plays a strategic role in supporting a vibrant mix of housing, employment, and community services. Located at the intersection of Douglas and Finlayson Streets, the site is directly adjacent to a future rapid transit station, identified as a key node for long-term investment. This area is envisioned to evolve into a main street environment, with active storefronts and employment uses fronting Douglas Street and opportunities for residential development above. Planned improvements in transit infrastructure, pedestrian experience, and urban greenery will further support its transformation into a connected, livable, and inclusive urban hub.

The proposed development supports several key goals of the Burnside Gorge Neighbourhood Plan:

- Encourages the creation of diverse housing types to meet community needs.
- Contributes to an enhanced public realm through thoughtful and attractive design.
- Promotes transit-oriented development along a Frequent and Rapid Transit corridor.
- Mitigates the effects of increased density by incorporating public amenities.
- Includes structured or underground parking to minimize surface-level impact.
- Is designed to integrate with and support the Douglas Street Frequent and Rapid Transit stops.
- Improves pedestrian experience at the southeast corner of Douglas and Finlayson Street.
- Provides ground-floor commercial uses along a key arterial road.
- Offers shared outdoor amenity spaces that enhance livability for residents.

Overall, the proposal is consistent with the land use policies and urban design principles outlined in the Mayfair Town Centre Douglas Corridor Sub-Area of the Burnside Gorge Neighbourhood Plan.



**Figure 2: Rendering of the proposed development from Douglas Street**

#### 4. CALUC MEETING

On April 7, 2025, the project's rezoning proposal was presented to the Burnside Gorge Community Association Land Use Committee (CALUC). Members of the project team attended the meeting to respond to questions from neighbours and community members regarding the proposed development. While the proposed height of 23 storeys exceeds the 12 storeys typically envisioned in the OCP, the Committee expressed support for the project, recognizing its alignment with the objective of encouraging higher density along the Douglas Corridor. CALUC submitted a letter of support to Mayor and Council, as well as Planning Staff, on April 28, 2025.

#### 5. PROJECT FUNDING & FINANCING

M'akola Housing Society intends to pursue funding through BC Housing's Community Housing Fund (CHF) and CMHC financing to deliver a mix of market and below-market rental homes. Access to CHF funding is critical as it enables the inclusion of deeply affordable and rent-geared-to-income units within the proposed development. As funding is not yet secured, the project has been designed to balance multiple funding programs with flexible uses to ensure future viability and protect the significant investment by MHS. MHS's mandate is to provide affordable rental housing but as funding has not been secured, we request no affordability covenants be tied to this rezoning.

To date, M'akola Housing Society has invested significant capital to acquire the subject property, and advance design and due diligence work. This investment demonstrates their deep, long-term commitment to creating meaningful, community-focused housing across British Columbia. This level of investment is rare among non-profit housing providers and represents a significant contribution to the City of Victoria's affordable housing landscape. In addition, as neither BC Housing nor CMHC fund non-residential spaces, M'akola Housing Society is self-financing the commercial spaces within the development, as required by the OCP and zoning bylaw, assuming further financial risk in advance of securing tenants to ensure the delivery of a vibrant, mixed-use community hub.

To realize this vision, a timely rezoning is essential. The CHF funding application process is highly competitive. Prolonged timelines will jeopardize the project's ability to access funding and could compromise MHS's ability to offer affordable rental units, reducing the project's overall impact.

#### 6. CLOSURE

Given the surrounding land uses and proximity to key amenities, the subject site is well-suited for increased residential density. The proposed mixed-use residential building and site design align with the City of Victoria's policy objectives and will meaningfully contribute to the community by introducing 208 much-needed affordable rental homes for Indigenous individuals, Elders and families. This development addresses a critical housing gap in Victoria and supports the City's broader goals of equity, inclusion, and housing affordability. The culturally significant, Indigenous-designed façade elements and public art will enhance the public realm and play a vital role in the

revitalization of the Douglas corridor and town centre area. M'akola is eager to advance the project, and the rezoning is a significant first step as it unlocks project funding and secures affordability for much-needed rental homes.