

Friday, July 28, 2023

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

**Attn: City of Victoria Council**

Mayor Alto and Members of Council,

**Re: Jubilee House Seniors Housing - Ashgrove Street  
Rezoning and Development Permit Application**

On behalf of our client, Milliken Developments, we are pleased to submit a development application for the proposed seniors housing development that will integrate with the Amica Jubilee House facility at 1900 Richmond Road. Through the process of meeting with city staff and our CALUC meeting on July 19th, 2022, and in subsequent design review meetings with Staff, we have received valuable feedback regarding our proposal and we are pleased to be making this application as we believe it is a realization of the development goals envisioned in the OCP and is a positive addition to the North Jubilee community, and the City as a whole.

**Description of Proposal**

The site fronts onto Ashgrove Street which is accessed from Fort Street to the west of the Fort and Richmond intersection. The site backs on to the Amica Jubilee House (Richmond) building to the east with two remaining single-family residences and a multi-family apartment building to the North, and an existing commercial office building to the South. Across Ashgrove Street there are single family residences and a multi-family apartment building at the Fort and Ashgrove corner.

The proposed development will add much needed seniors rental apartments to the mix of care and specialized dementia care suites and services provided in the Richmond building, creating an integrated age-in-place facility within the North Jubilee neighbourhood. As part of the proposed amenity package there will be \$1 Million Community Amenity Contribution to the City of Victoria, just above the recommended contribution level indicated in the Land Lift Analysis Report.

The proposed new 6-storey concrete building will provide 88 suites of seniors housing, adding to the 125 suites in the Richmond building. The existing properties along Ashgrove Street are zoned R3-2 and R1-B so a rezoning is required to permit the proposed development. The proposed floor area ratio is 2.32 to 1 and site coverage is 48% making the Phase 2 building a smaller companion to the Phase 1 building under construction.



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## Government Policies

The property is designated Urban Residential in the Official Community Plan (2012), which prescribes primarily ground-oriented multi-unit residential. The suggested built form includes low-rise and mid-rise multi-unit buildings up to approximately six storeys. The proposed development is at the maximum range of allowable height and density within the OCP designation which is fitting for a development that is close to major transportation routes, civic infrastructure, shops, medical services, and the downtown core.

We are also proposing to include this site in the emerging *Housing Opportunity Urban Place Designation* that has evolved from the updates to the local area plans in the North Park, Hillside, and Fernwood Neighbourhoods. This designation allows for multi-unit residential in low and mid-rise apartment forms, with a public realm character similar to Urban Residential. At higher densities, Housing Opportunity areas are envisioned to accommodate primarily secured rental housing and provide public benefit, including amenity contributions and on-site, non-market and affordable rental where possible. Additional increased density of approximately 2.5:1 may be considered for projects where substantial public benefit is provided, consistent with the objectives of the OCP and other City policies. This emerging Urban Place Designation indicates a level of understanding and willingness to allow for increased development densities in traditionally less-dense neighbourhoods, as one of many tools required to fix the housing affordability issues in our region.

The proposed development site is within the General DPA 16. In keeping with the intent of DPA-16 the ground floor is dedicated to active, communal spaces that open onto the adjacent streets, encouraging the spilling out of activity in to the surroundings, and the street-facing ground floor units are developed with walkable entrances from a common internal walkway.

## Density Rationale

We believe that there is much justification for a modest increase in building density (FSR) from an allowable 2 to about 2.5.

First, our proposed building is an OCP supported 6 stories, including a rooftop seating and viewing area. It has been described as 7 stories in the planning report because of the rooftop area. We understand that in central Victoria rooftop access is not considered an added story. For reasons we are unclear on, this has not been adopted in the Jubilee and adjacent neighbourhoods.

Our building does not require setback variances. It conforms to setback requirements.

What increases, slightly, the calculated building FSR is our floorplate size. Our floors are designed for senior's with an average age well past 80 years old. In the soon to open Jubilee House first phase, which is an all care building looking after seniors with cognitive and physical care needs, the average age approaches 90 years old.



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We have designed both buildings to provide a senior's community on each floor. Each floor in phase 2 is designed to accommodate about 15 seniors. Phase 1, where residents remain on their floors much of the day, has about 25 seniors per floor. The common areas on each floor are spacious enough for gathering comfortably with neighbours – space to sit comfortably and chat. To reduce the calculated FSR for the building would require a combination of reducing the phase 2 resident count by perhaps one senior on each floor and reducing the gathering space on each floor. We don't believe that this is in the interest of the future residents of Jubilee House. And we don't believe that this would improve the North Jubilee neighbourhood at all.

We believe that the location of Jubilee House phases 1 and 2 is highly appropriate for a very well designed seniors community. It is on major roads which provide for easy access for visitors. It also provides for easy access for staff, being on major bus routes. The subject large block is already higher density, with an apartment building, a seniors community (Jubilee House phase 1) and two commercial buildings. Adjacent are medical buildings and retail and office space. And two blocks away is the Royal Jubilee Hospital.

Perhaps most importantly, providing 88 seniors with rental accommodation at our location will provide Victoria with its most important "Continuum of Care" community for Victoria seniors. Couples and singles will be able to move into Jubilee House phase 2 when it is convenient for them. When and if their need for care increases, they will not be required to relocate within Victoria. Jubilee House will provide end of day's care, with the only exception being a need for nearby hospital care. In other independent living seniors communities residents and their families are regularly asked to move to another location when their need for care increases beyond what the building was designed to accommodate.

We hope you will support Jubilee House phase 2. We believe it will be a very positive addition to nearby neighbourhoods and Victoria generally.

### **Project Benefits and Amenities**

The proposed development will provide 88 suites of rental housing for seniors with varying degrees of independence, complementing and joining with the services provided in the Richmond building, and providing a much needed aging-in-place facility for the North Jubilee neighbourhood.

A Land Lift Analysis and Report has been prepared by Coriolis Consulting which indicates the approval of this proposed expansion will result in a contribution to the City of Victoria of \$998,250. This amount will be rounded to \$ 1,000,000 (One Million) dollars.

There will be significant improvements to the quality of sidewalks, boulevards, and street trees along the north side of Ashgrove Street. The sidewalk will be completely rebuilt, widened, and shifted inboard from the street within a new SRW creating a new boulevard with street trees and a safer and more comfortable pedestrian street edge. The site has been redesigned to eliminate a proposed porte-cochere driveway access on Ashgrove street and the underground parking structure has been modified to eliminate any underground construction in the front setback along Ashgrove Street, ensuring the long term viability of proposed trees along Ashgrove Street and within the front setback area.

The design also incorporates significant stormwater management features with on-site detention and infiltration gardens unimpeded by underground structures (parking) on the west and north sides of the building in accordance with the principles of the Bowker Creek Initiative.

### **Need and Demand**

The demand for seniors housing, as it is with all forms of housing in Victoria, is extremely high and getting higher every year. Data released by the Canada Mortgage and Housing Corporation (CMHC) in their annual Seniors' Housing Report in 2020 indicated the overall vacancy rate for independent living residences across Metro Victoria and the Gulf Islands was 3.4% in 2020, compared with 5.0% in 2019, which is lower than the provincial average (5.1% in 2020 and 4.2% in 2019). The lack of options for higher end care (dementia & long-term care) throughout Canada is particularly disturbing. According to the Alzheimer Society of Canada:

*“The number of Canadians with dementia is rising sharply. As of 2016, there are an estimated 564,000 Canadians living with dementia - plus about 25,000 new cases diagnosed every year. By 2031, that number is expected to rise to 937,000, an increase of 66 per cent. Canada’s health-care system is ill-equipped to deal with the staggering costs. As of 2016, the combined health-care system and out-of-pocket caregiver costs are estimated at \$10.4 billion per year. By 2031, this figure is expected to increase by 60 per cent, to \$16.6 billion. Roughly 56,000 Canadians with dementia are being cared for in hospitals, even though this is not an ideal location for care.”*

- <http://alzheimer.ca/en/Home/Get-involved/Advocacy/Latest-info-stats>

The proposed development will provide a continuum of care within North Jubilee; the Richmond building is the key component with the more complex care and service spaces provided, with the Ashgrove building providing a transitional housing option for those residents seeking more independent living with access to services and amenities as desired. As part of the commitment to addressing this need on a long-term basis the Developer is willing to secure rental tenure on the building for its entire life.

### **Neighbourhood**

The existing neighbourhood is a mix of residential, commercial, and institutional uses with a combination of single-family and multi-family residential buildings on secondary streets and commercial uses on the primary arterial roads. The proposed development consolidates a mix of residential-zoned sites and the existing surface parking and loading access driveway for the Richmond Road building into a consolidated development that includes the new building and the Richmond Road building into a single property.

The existing stock of older multi-unit apartment buildings in the neighbourhood reflect the time of their development as they are generally 3 or 4 storey buildings with surface and



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under-building parking, developed in the mid-to-late 1900's. The proposed development is reflective of the development goals and population parameters contained within the OCP and seeks to maximize the potential for development on the land in an area where the existing transportation, social services, and City infrastructure already exist and can support increased development density.

## Impacts

The proposed development is a change from the existing form and character of development along Ashgrove Street. The following steps have been taken to mitigate the impacts on adjacent properties:

1. The setbacks to Ashgrove Street and the residential property to the north have been maximized to mitigate overlook and shadowing concerns. The setbacks to the east and south (commercial) have been reduced.
2. The units facing north to the adjacent residential property have secondary windows (bedroom / den) and clearstory windows in living areas facing the adjacent property to minimize overlook concerns.
3. The top floor is set-back from the lower floors to reduce the overall massing of the building.
4. The primary (west) elevation facing Ashgrove Street has articulation, changes in colour and materials, and additional exterior features that visually break-up the building into smaller segments.
5. The ground-floor units facing Ashgrove have individual entrances from the internal walkway to give them an enhanced street presence.
6. Access to the expanded underground parking will remain as-is (from Birch Street) - no additional traffic on Ashgrove Street - and the surface parking and loading access from Ashgrove is also the same as already approved in the Phase 1 development.

The ground-oriented units are further expressed on the site with usable patios framed with ornamental planting. The landscape treatments are carried around the entire development with internal walkways and sitting areas interspersed with planted areas and lawn. Additional resident garden beds, walking paths, and seating areas are proposed in the shared landscaped area between the two buildings and a new amenity area with plantings, beekeeping hives, and seating areas proposed for the rooftop of Phase 2.

## Design and Development Permit Guidelines

The proposed design is a contemporary expression of a mid-rise residential apartment building. In response to the City of Victoria's *Design Guidelines for Multi-Unit Residential, Commercial and Industrial*, and to integrate well with the Richmond Road building, the proposed development offers the following design features:

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- A contemporary design and distinctive massing with high quality, durable materials that will weather gracefully over time.
- An articulated architectural form with materials and colours that integrate with the Richmond Road building.
- Implementation of a widened sidewalk and boulevard with street trees to expand Ashgrove Street.
- A residential use that is in high demand and a positive contribution to the community.
- Relief in overall massing by stepping-back the upper floor.
- Strong interface with the street through significant landscaping
- Strong entry feature with covered seating and pick-up / drop-off parking.
- Residential entrances to suites at ground level.
- Interior spaces available for use by the community (bistro / private lounge).
- Rooftop amenity space for residents with raised planters and beekeeping hives.
- Rooftop solar panels to provide significant energy savings and GHG reductions.

### **Safety and security**

The implementation of Crime Prevention Through Environmental Design (CPTED) principals is multi-disciplinary approach to promoting community safety through the thoughtful and meaningful design of the environment. CPTED principles will be utilized throughout the site design and landscaping to ensure there are no negative effects or increased opportunities for nefarious activities as a result of the proposed development. Ground-oriented suites and visually open common areas and entrances will ensure a high degree of street and side yard overlook and territorial ownership is maintained.

### **Transportation**

The proposed development is a licensed seniors residence, which offers significantly reduced parking and traffic requirements compared to other multi-family developments and the site is well served by major bus routes. The underground parkade is accessed using the existing ramp from Birch Street. The parking provided for the proposed development exceeds the requirements in Schedule C. A traffic demand management study has been completed and is included in the development submission package for Staff review.

### **Green Building Features**

With the evolving adoption timelines for the BC Energy Step Code, the applicant team is acutely aware of environmental considerations, and is anticipating a Step 2 compliant

building. While precise design detailing is not fully determined, our team is committed to reviewing all aspects of sustainability and providing building systems in line with industry best practices. Sustainable items will include:

- Photovoltaic panels on the roof
- Increased mechanical and electrical efficiencies
- Increased building envelope systems and thermal performance
- Acoustic isolation measures for HVAC equipment
- Design for changes in local climate
- Waste water reduction
- Storm water retention
- Low-water intensity native plantings
- Diversion of construction waste from landfill

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### **Infrastructure**

While the detailed design of the building and tie-ins to the existing infrastructure have not yet been calculated, our preliminary review of the utilities indicates sufficient service to accommodate the proposed development. These calculations will be confirmed through the design process.

The proposed development is accommodating the City's required Statutory Rights-of-Ways (SRW's) along Ashgrove street to permit sidewalk relocation and introduction of a boulevard with street trees.

We are excited about our proposed development and look forward to working with the City to ensure this project is a successful addition to the North Jubilee neighbourhood.

Sincerely,



Charles Kierulf architect AIEC MRAIC  
dHKarchitects