

September 27, 2022



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

Attn: City of Victoria Council

Dear Mayor Helps and Members of Council,

**Re: Douglas House Seniors Housing
OCP / Rezoning / DP / Heritage Alteration**

On behalf of our client, Milliken Developments, we are pleased to submit a development application for our proposed redevelopment of the Amica Douglas House facility at 50 Douglas Street in James Bay. Through our meetings with city staff and our CALUC meeting on January 12th, 2022, we believe this proposal is a representation of an inclusive and respectful process between all required stakeholders, and is a positive contribution to the James Bay community and the city as a whole.

Description of Proposal

The site fronts onto Douglas Street in the very desirable south edge of James Bay, a block from the beach and facing onto the hill of Beacon Hill Park. The site is bounded by Niagara and Battery Streets to the north and south and multi-family and single-family residences to the West. The site currently houses Amica's Douglas House independent and assisted living facility. Built in 1966 Douglas House currently has 102 units in two interconnected buildings. The current building is at the end of its useless life with small elevators, low ceiling heights and no central air conditioning. There is also a heritage house fronting Battery Street that Amica uses to provide market rental seniors housing.

The proposed new 8-storey concrete building will increase the amount of seniors housing from 102 to 200 units, including 62 new memory care beds. The existing R3-2 zone and Urban Residential OCP designation would need to be changed to permit the increased height, density, and coverage required by this redevelopment. The proposed floor area ratio is 3.1: 1 and site coverage is 50%.



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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 consists of attached and detached buildings up to three storeys, and low-rise and mid-rise multi-unit buildings up to approximately six storeys. The proposal addresses the intent of the OCP by stepping building heights from 4.5 to 7 storeys at streets and sideyards, with an inset 8th floor penthouse level occupying a significantly smaller footprint than the lower floors. The average building height along the four blocks north on Douglas is above 6 storeys.

The higher density provisions of the Urban Residential designation are justified through the advancement of a number of OCP objectives: 1) Growth is concentrated on transit arterials and secondary arterials; 2) There is range of housing types from independent living to complex care; 3) There is equal walkability to both James Bay Village and Cook Street Village; 4) There is sensitive densification worthy of supporting district energy systems; and 5) The massing provides significant variability in how it frames street. Urban Residential has a base density of 1.2: 1, an increased density of 2 : 1, and a maximum density of up to 2.5 : 1.

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 neighborhoods. 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 density in traditionally less-dense neighborhoods, as one of many tools required to fix the housing affordability issues in our region.

The single site straddles two different development permit areas: DPA 16 along part of Niagara and Heritage Conservation Area 1 (Battery Street) along Douglas and Battery. Within HC-1 the development should fit within the context in terms of scale and be sensitive to the heritage context. The Heritage portion of the site corresponds with the heritage designated house at 674 and 676 Battery Street, which will be retained and restored as part of this redevelopment.

In keeping with the intent of DPA-16 the ground floor is almost exclusively dedicated to active, communal spaces that open onto the adjacent streets and encouraging the spilling out of activity into the surroundings.

Project Benefits and Amenities

The proposed development will provide care for 200 seniors with varying degrees of independence, which is desperately needed in James Bay and the city as a whole.

In addition, we will be creating a high quality, high performance new facility to replace the aging existing buildings currently on the site. Our redevelopment will improve the landscaping and street edges, ultimately improving this section of Douglas Street.

Because the site fronts on to three streets, there will be significant improvements to the quality of adjacent sidewalks, boulevards, and street trees in the neighbourhood. The Niagara sidewalk will be completely rebuilt and widened, creating a safer and more comfortable pedestrian street edge. The existing mature front yard trees will be retained as much as possible, and new trees will be added to create a beautiful green framing of the street.

Need and Demand

It's no secret that the population, as a whole, is getting older: we are living longer, healthier lives. As a result, the demand for seniors housing, in all forms, 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 for James Bay; a unique and much-needed housing typology within the area.



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Neighborhood

James Bay is a densely populated mixed-used neighbourhood anchored by many of Victoria's most significant citywide attractions including a publicly-accessible shoreline, Beacon Hill Park, and the ceremonial precinct comprised of the Parliament Buildings, Inner Harbour and the Royal BC Museum. In addition to the Parliament Buildings and ceremonial grounds, CPR Steamship Terminal, and The Royal BC Museum there are a number of other heritage landmark buildings in the area.

The neighbourhood is a major international visitor entry point, with a cruise ship terminal, ferry terminals and significant working harbour component facilities. As such, it forms the centre of tourist accommodation and visitor services for the City. It is also home to a large portion of the city's rental housing stock.

In contrast to the ceremonial and tourism areas in the west and north sides of the peninsula, the area surrounding the subject site is more consistently single and multi-family residential, with higher density housing concentrated along Dallas Road and Douglas Street, framing the edge of Beacon Hill Park.

Impacts

Because the building is flanked by large street right-of-ways on both the North and East sides the majority of shadows cast by the building do not fall on private property. This is illustrated through the enclosed shadow study.

The amenity-rich ground floor programming is telegraphed onto the site with usable patios framed with ornamental planting. These activate the pedestrian realm along all three surrounding streets. The active program spaces (bistro, games room, salon) are located adjacent to the intersection to engage the community and provide vibrancy to the corner; but the residences located above the main level will be a quiet addition to the neighbourhood.

Design and Development Permit Guidelines

The proposed design is a contemporary addition to the community, offering high quality and durable materials that respect the existing neighbourhood. The intent of design is to support the Urban Residential designation outlined in the OCP. Density and height is stepped back towards the corner of the site, reducing the overlook and shading of lower density neighbours. In response to the City of Victoria's *Design Guidelines for Multi-Unit Residential, Commercial and Industrial*, the proposed development offers the following

design features:

- A contemporary design and distinctive massing that accommodates the changing demographics in seniors housing
- A sensitive building design with high quality, durable materials that offer a sense of permanence and respects the character of the neighbourhood
- Highly articulated architectural form with heritage colours that promotes a design character unique to Victoria.
- Implementation of wide sidewalks and open space at the intersection that provides a sense of place
- A program that is in high demand and a positive contribution to the community
- Relief in overall massing through a significant step in massing at upper floors.
- Recognition of the history of single family lots (50'-60' wide) in the area through use of vertical massing elements.
- Variations in rooflines and massing with strategic use of overhangs to enhance the architectural character
- Street wall design to reduce perception of overall massing
- Strong interface with the street through significant landscaping
- Strong entry feature and porte-cochere
- Extensive use of glazing at ground level
- Providing interior space for use by the community (fitness, private lounge)
- The amenity space on the main floor will be open to the local community. Rooms can be reserved for neighbourhood meetings, bridge, etc.



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Safety and security

The safety and security of both the community and residents of the proposed development is of utmost importance, especially given the nature of the proposed development. 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 involves the balanced application of three basic principles, which are implemented in the proposed development:

1. Natural surveillance

Natural surveillance is created through the establishment of clear sight lines, enabling building occupants to monitor the surrounding environment. The proposed development offers the following natural surveillance concepts in the design:

- driveways and paths are oriented towards natural forms of surveillance such as building entrances and windows
- building entrances, stairwells, and access points receive increased visual permeability through the strategic use of windows, fencing, and landscaping
- pathways, internal sidewalks, and all concealed spaces will receive strategic lighting to prevent unwanted access

- highly-active interior spaces capable of generating activity are strategically located and augmented by the use of extensive sidewalks, outdoor seating areas and amenity spaces to promote continuous use

2. Natural Access Control

Natural access control aims to decrease crime opportunity. Forms of access control includes fences, low walls, landscaping, gates and any barrier that is natural for the environment including topographical features. Natural access control applications for the proposed development include:

- providing clear border definition of controlled space through the placement of fences, guardrails and obstructions
- limiting uncontrolled and/or unobserved access onto properties, buildings and private space
- using space to provide natural barriers to conflicting activities.

3. Territorial Reinforcement

Territorial reinforcement is a design concept that realizes that physical design can create or extend a sphere of influence so that users develop a sense of proprietorship that is noticeable to a potential offender. Natural surveillance and access control can help people to develop a sense of ownership about a space regardless of whether or not they own it and develop a sense of pride for a community. Territorial reinforcement applications for the proposed development include:

- creating clearly marked transitional zones as persons move from public to semi-public and private space through the use of paving patterns, signs and entry features
- providing amenities in communal areas that encourages activity and use throughout the day
- creating space that is inviting to the public and encourages public interaction
- creating a high quality building of which residents and community members can be proud
- implementing a visitor reporting procedures for entry into the building
- conducting timely maintenance that ensures building longevity

Transportation

The proposed development is a seniors campus of care facility, which offers significantly reduced parking and traffic requirements compared to other developments. The applicant team has discussed the parking requirements with the City and are proceeding with a parking requirement of 0.35 stalls/unit plus 0.1 visitor stalls/unit for the development. Proposed parking currently meets this requirement. The underground parkade is accessed off Niagara Street. Based on market research and previous experience developing similar buildings, the vast majority of residents will neither drive nor own a car. Primary traffic generation will be a result of staff usage, however due to the location, it is anti-



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pated that the majority of staff will make use of public transit.

The Traffic Impact Assessment completed by Watt Consulting Group for 50 Douglas Street concluded that *“the addition of the development traffic does not affect the operations of the Douglas Street/Niagara Street intersection”*. With the development, all movements will continue to operate at the same levels of service (LOS A/B) as the existing conditions at Douglas Street / Niagara Street.



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Heritage

Occupying the southwest corner of the site is the historic Rutland Residence, a wood-frame Late Victorian-era residence. Constructed in 1889, it is valued as an early representation of the Victorian-era development of the James Bay neighbourhood. It is additionally valued for its history of ownership, as it evolved from a single-family house to a multi-family dwelling, and for its Italianate style architecture. Heritage consultants Donald Luxton & Associates has prepared a project-specific conservation plan that will be used to faithfully restore and revitalize the house to become a focal point of the redeveloped site.

Green Building Features

With the evolving National Energy Code and the BC Energy Step Code, the applicant team is committed to sustainable development and will meet or exceed municipal and provincial requirements. 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
- Increased mechanical and electrical efficiencies
- Increased building envelope systems and thermal performance
- Acoustic considerations
- Waste water reduction
- Storm water retention
- Passive solar systems
- Indigenous, low-water landscaping
- Decreased construction waste

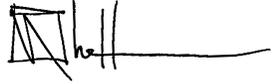
Infrastructure

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 (SRWs) and will work with the City and community to design inviting, and pedestrian-friendly interfaces along all public edges of the site.

We are excited about our proposed development and look forward to working with the Mayor and Members of Council to ensure this project is a vibrant addition to James Bay.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Whetter', with a horizontal line extending to the right.

Rob Whetter architect AIBC LEED™ AP
de Hoog & Kierulf architects



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