

City of Victoria
#1 Centennial Square
Victoria, BC V8W 1P7

Attn: Mayor and Members of Council

1248330 BC LTD.
8270 Thomson Place
Victoria, BC V8M 1T4

June 15, 2023

Past submissions:

- September 30, 2021
- January 25, 2021
- June 15, 2021
- November 2, 2021
- June 16, 2022

RE: RE-ZONING AND DEVELOPMENT PERMIT APPLICATION: 1042-1044 RICHARDSON STREET

Dear Mayor and Members of Council,

We are pleased to submit an updated Rezoning and Development Permit Application for 1042-1044 Richardson Street. Following the 5-4 referral motion made by Council on July 14, 2022 for staff to *“work with the applicant on a revised application for rental housing that achieves greater consistency with the Fairfield Neighbourhood Plan and other City of Victoria policies, particularly as it relates to liveability of future residents on this parcel, as well as liveability of residents on neighbouring parcels”*, we worked with planning staff on revision options for a re-submission, trying to refine the design reviewed at the COTW. However, due to requested changes to density, height, and setbacks deemed necessary to adequately address the motion, the project was considered to be no longer feasible without a significant re-design. Rather than abandon the project as a rental proposal (or altogether), we decided to revise and re-submit the proposal as a houseplex, which retained the existing buildings on-site with a proposed addition. This housing form was suggested as being ‘ideal’ for the proposed site by Mayor and Council at the COTW meeting (**Appendix A** outlines how this revision responds to the staff review and ADP).

Still pursuant of the principal objectives of the original proposal, such as sustainable energy efficient design, adding rental stock in the rental retention zone of Fairfield, and being bike-oriented, this proposal would create six additional purpose built rental units on the site (for a total of 11 rental units). The plan includes a NEW accessible unit, as well as a NEW 3-bedroom rental unit. With this revision, we feel that this re-submission adequately responds to all comments made by Mayor and Council at the COTW meeting on July 14, 2022, where a five-storey 20-unit, purpose-built rental building was considered (See **Figure 1** for an illustration of changes). This letter explains how this proposal aligns with existing policies and will contribute the Fairfield Neighbourhood of Victoria.

Figure 1: Project Redesign Illustration

July 14, 2022 COTW Proposal (20 Unit Rental Building)



June 15, 2023 Proposal (11 Unit Rental Building)



DESCRIPTION OF PROPOSAL

This re-zoning and development permit application is requesting to re-zone the current site from R-K to a site-specific zone to allow for construction of an addition to the front of the existing main building which would increase the total number of rental units in the main building from 4 to 10, while retaining the existing garden suite, for a total of 11 purpose-built rental units. The following unit mix is proposed:

- One 3-bedroom units
- Two 2-bedroom units
- Six 1-bedroom units (Including one NEW accessible unit)
- One bachelor unit and one bachelor (loft unit) (the Retained Garden Suite)

Due to the extent of the renovation and addition, existing tenants will be displaced. Consistent with the City of Victoria Tenant Assistance Policy (2019), a Tenant Assistance Plan has been developed, and has been provided to tenants.

NEIGHBOURHOOD CONTEXT, SITE CHARACTERISTICS & EXISTING ZONING

1042-1044 Richardson St. is located mid-block on the 1000 block of Richardson St. on a flat lot that is artificially elevated from the street (it is one building east of Cook St.). The project site is comprised of one legal lot that is 668m² lot (7190 sq. ft) in size. The site is situated in a densely populated portion of Fairfield that is in close proximity to the downtown core and is surrounded by a mix of multi-residential units including a blend of strata condominiums, rental apartments, and townhouses. To the east of the property is a large three-storey rental apartment building (1050 Richardson St.). North of the site (1035 McClure St.) is a four-storey condo building containing 29 units, with at grade parking both uncovered and enclosed within a single storey garage that runs along the westerly property line of 1042 Richardson St. Across the Street is four storey rental apartment building. Other nearby multi-unit properties on Richardson St. include two townhouse developments, a four storey 20-unit condo building, and two other four-storey rental apartment buildings (See **Figure 3** for reference images).

The 1000 Block of Richardson St. exemplifies the accretion of urban form and character and is distinguished by diverse architectural forms with generally large footprints that were completed in different eras. This ranges from traditional walk-up apartments completed in the 1950s and 1960s, to more contemporary strata condo and townhouse projects completed in the 1990s and early 2000s. The most recent addition to the streetscape is 1020 Richardson St. (Terra Verde by Abstract Developments completed in 2011).

Figure 2: Project Site (1042-1044 Richardson Street)



The subject site at 1042-1044 Richardson St. is the only site on the block that has not been developed to a higher density (with the exception of heritage homes fronting Vancouver St.), and would be the first new rental units to be added to the street since the 1960s. The site is currently zoned R-K (Medium Density Attached Dwelling District) and hosts two structures with a total of five rental units: A main house that contains three one-bedroom units and a bachelor suite, and a separate carriage house / garden suite (bachelor suite), both of which are proposed to be retained and improved in this proposal. The five existing units do not have any off-street parking or bicycle parking.

Figure 3: Site Context (Multi-Residential Units Surrounding Project Site)

1050 Richardson Street (Immediate Neighbour)



1035 McClure St. (Immediate Neighbour)



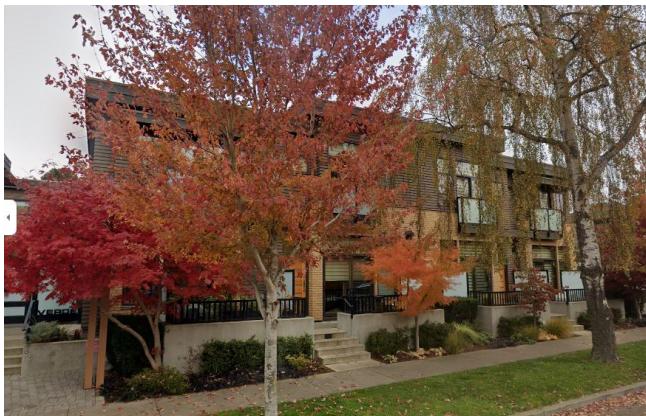
**1041 Richardson Street
(Immediately Across Street)**



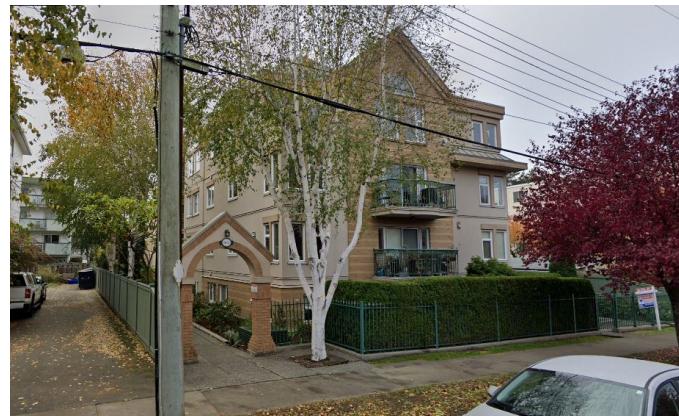
**1045-1051 Richardson Street and 666 Cook Street
(Immediately Across Street)**



**1020 Richardson Street
(One lot over on same side of street)**



**1037 Richardson Street
(One lot over across the street)**



ARCHITECTURAL EXPRESSION

The proposed building form and character retains the traditional design elements of the current buildings, originally constructed in 1910, while adding some contemporary elements such as a metal roof detail. This varied design complements the diverse architectural forms on the 1000 block of Richardson Street.

Providing an exterior entry for each of the units, the renovation and addition aimed to retain as many existing entrances as possible to limit impacts on neighbouring properties. In total four of the seven existing building entrances were retained, all of which are located near the rear of the site. The proposal adds three new entrances fronting Richardson, two new entrances on the east side of the property (replacing a single entry point in approximately the same location, which was formerly the main entry to the building), and three new entrances along the west side of the property (replacing a single entry point to a single suite). The three entrances on the west side of the property oriented towards the west property line are sunken to limit any impacts on the neighbouring site.

The architectural design aimed to provide private outdoor space to as many units as possible. In total, ten of the eleven units have private outdoor spaces, with the remaining unit having a Juliet balcony and access to the shared rear yard space. This is a significant improvement from the existing design where only two units have semi-private outdoor space (sharing the rear yard). There are no balconies on the east side of the building, which has a setback of 1.17M (the existing building setback). The easterly setback for the addition is enhanced, ranging from 2.27m (to an entry landing) to 3.67M for the building façade of the new proposed addition.

DEVELOPMENT PERMIT & POLICY GUIDELINES

Below is a summary of how building design aligns with the [Official Community Plan](#) (2012; Updated February 27, 2020), [Fairfield Neighbourhood Plan](#) (2019), and [City of Victoria's Design Guidelines for Multi-Unit Residential, Commercial & Industrial Development \(2012\)](#).

1. Official Community Plan

This site is designated as Urban Residential in the Official Community Plan (OCP). In the OCP, Urban Residential sites support attached and detached buildings up to three storeys and mid-rise multi-unit buildings up to approximately six stories and floor space ratios ranging from up to 1.2:1.0 to 2.5:1.0 depending on location. This proposal aligns with the OCP in terms of use and density.

2. Fairfield Neighbourhood Plan

This site is located in the Rental 'Retention Sub-area' of Fairfield. In this area, development that retains and/or increases the supply of rental stock is encouraged (Section 8), with development up to approximately 2.0: 1.0 FSR and six storeys (20 Meters) to be considered (p. 74, 2019). At 2 storeys and 1.1: 1.0 FSR, this proposal is significantly lower in terms of building height and density than the guidelines set out in the Fairfield Plan. The adaptive reuse of the existing buildings on the site also aligns with several objectives in the Fairfield Plan.

With housing affordability and increased diversity of housing options being central to the Fairfield Neighbourhood Plan, unit mix was selected to meet specific needs set out in the local area plan. Specifically, the inclusion of a 3-bedroom unit, and an accessible unit, as sec. 9.1.2 stated that more housing is needed which is geared towards "families (3+bedrooms), seniors and working people with low incomes".

Form and Character Objectives for Urban Residential Areas in the Fairfield Neighbourhood Plan were used as a guide in the design of this proposal. Being pedestrian-centric was foundational to design. This was achieved by incorporating walkways around the building, and locating the bicycle room near the front of the site, close to the street for easy access. There is a shared rear yard garden area, intended to serve as a comfortably sized outdoor gathering place for residents to enjoy.

3. Multi-unit Residential Design Guidelines:

Details of design were guided by the City of Victoria Design Guidelines for Multi-Unit Residential, Commercial and Industrial (2012). Below are examples of how the proposal aligns with these guidelines, with specific reference to site siting, massing, street relationship and exterior finishes:

- **Site siting:** The siting of the proposed building maintains the continuity of the street edge on Richardson St., providing some space for front yard landscaping (Sec. 2.3.2). The proposed front yard setback will bring the property in line with other buildings along Richardson Street to create a more consistent streetscape. The generous boulevard on Richardson St. further softens the interface of the building with Richardson St. Siting the building close to the front of the property also allows for spatial separation from neighbouring buildings.
- **Streetscape / Street-relationship:** The building interfaces with the street by providing a prominent shared entrance and staircase access to three of the units fronting Richardson Street. Pedestrian oriented pathways with wayfinding signage provide access to the remaining units. At two stories, the building will not have a dominating presence on the street, as it is among the lowest buildings on the block. Privacy impacts of adjacent buildings were carefully considered in the re-design, with the majority of principal windows face away from existing buildings, with most windows facing onto Richardson Street or to the West. Entrances on the West façade are sunken, with screening (fencing), to limit impacts on the neighbouring site.
- **Exterior Finishes:** The finishes selected deliberately avoid a mashup of material, colour and texture and relies on a well composed, intentional architecture that is durable, and timeless. This ensures that the building is maintainable and weathers/ages consistently, rather than presenting a varied protocol for maintenance through the life of the building.
- **Landscape:** The proposed landscape plan optimizes replacement trees along the building frontage and rear yard. A mix of soft ground covers and hardscape pavers and surfacing are composed to reinforce paths and movement on the site.

TRANSPORTATION

This proposal not proposing to add any off-street parking spaces to the site. Watt Consulting Group conducted a parking analysis relating to this proposal examining expected demand and recommending a number of Transportation Demand Measures (TDM) aimed at reducing the use of private vehicles as a transportation typology, and a demand for on-site and off-street parking. This proposal provides the following TDM measures recommended by Watt Consulting Group. These include:

1. Committing to purchase of an electric or hybrid Modo carshare vehicle for the site and providing memberships to each unit, which will provide a viable mobility option for residents and reduce dependency on vehicle ownership.
 - a. A dedicated on-street parking stall for car share with an accompanying electric vehicle charging station is proposed. This stall would increase visibility and promote car sharing use in the larger

community. On-street charging infrastructure will be constructed by the developer to the satisfaction of the Director of Engineering and Public Works. Following installation, ownership of the charging station will be transferred to the City of Victoria. An off-street parking stall will be provided should the car share vehicle need to be relocated due to street maintenance or renewal. This parking stall will be used for visitor parking in the interim. Car share memberships and usage credits will be provided to all residents.

2. Providing 17 long-term bike parking spaces, which are conveniently located in secure bike room near the front of the property. Electric bike charging is accessible long-term bicycle parking stalls, and 4 of the long-term spaces can accommodate cargo bikes. *Note: this space could also be used for other types of sustainable transportation devices to meet the unique transportation needs of residents, such as electric scooters (i.e. vespas, mobility scooters, standing powered scooters, etc.);*

Proximity to the downtown core and amenities at Cook St. Village is central to the parking variance request. It is expected that the site will service those who are within walking distance to their place of work, and being that it is a rental building, will have lower vehicle ownership rates than typical strata condominium projects. According to walkscore.com the site is 'very walkable' (walkscore of 93) and has 'excellent' access to public transit (transit score of 88). It is also situated on a dedicated All Ages and Abilities (AAA) bicycle route and is a 'biker's paradise' with a bike score of 83. The location in proximity to established and emerging bike routes, influenced design of the building to encourage and support the use of bicycles.

Figure 4: Walkscore.com



IMPACTS

At two stories, this proposal will remain at the same height it has been since initial construction (1910), and will be lower in height than neighbouring buildings to the east and north, which are three and four stories respectively. As the addition is located at the front of the site (towards Richardson Street) there will be limited shadowing implications, with shadows from the addition being cast primarily onto the at grade parking lot of the 1035 McClure Street. There are no balconies facing immediate neighbours on the east or north of the building. All balconies and principal windows are oriented towards Richardson Street, or to the West, which overlooks at grade parking for 1035 McClure Street.

INFRASTRUCTURE

There are existing services and sidewalk on the property frontage. A sanitary impact assessment was conducted which indicated that the proposed development would not increase the sanitary load on the City System any more than what could be discharged from the site under the existing zoning.

HERITAGE

Building structures included in this proposal do not have recognized heritage value. The Senior Heritage Planner for the City of Victoria was contacted, and following review, it was determined that the building does not have enough character or value to justify the city pursuing heritage designation. However, character elements of the existing buildings are being included in the proposed addition to retain the existing form and character.

SAFETY AND SECURITY

The proposal acknowledges and integrates key CPTED principals to maintain and increase safety and security. There are three unit entrances with direct access to the street. 'Eyes on the street' are increased with views from principal living spaces being directed towards Richardson Street and open air parking areas on neighbouring sites. Site lighting will be used illuminate pathways and shared areas with ambient light provided to promote safety and visibility of landscaped areas.

GREEN BUILDING FEATURES

The following is a list of green building initiatives that will be deployed within the project:

- Meeting Step 3 of the BC Energy Step Code.
- Use of exterior durable materials designed to last the life-span of the building and be easily/readily maintained.
- Providing directly metered suites with multiple thermostatically controlled heating zones in each residence.
- Rough-in for Solar Panels Ready on the roof of the building.
- Use of LED lighting throughout the project
- Low-VOC paint in all interior areas.
- Low-flow plumbing fixtures used throughout all units.
- Secure bike storage with electrical outlets for electric bicycle charging.

Note: As this proposal is submitted after May 1, 2023, new enhanced energy efficiency requirements of the 5th revision to the 2018 BC Building Code are now in effect. These latest standards, which mandate a roughly 20% improvement in insulation values under the prescriptive path, will be incorporated into the building permit application.

PROJECT BENEFITS AND AMENITIES

- This project will bring 6 new units of rental housing stock to the City of Victoria. This includes a 3-bedroom unit and an adaptable rental unit. The unit mix provided is specifically designed in response to community feedback collected in the Fairfield Plan development, which suggested more housing in Fairfield targeted to families(3+bedrooms), seniors and working people with low incomes (sec. 9.1.2)."
- The car-share vehicle provided will contribute to an increasing fleet of shared vehicles in Victoria, which will not only be accessible for residents of 1042-1044 Richardson St., but also to members of the community at large.
- The overt mobility strategy prioritizes the use of bicycles as a prominent lifestyle feature, ensuring bicycle use is convenient and highly accessible.

PROJECT TEAM

We are pleased to be working with a talented project team of professionals local to Victoria, with extensive experience working with the City of Victoria. These include:

- Christine Lintott Architects Inc., Architect
- LADR Landscape Architects, Landscape
- Spot Design Co., Interior Design
- Powell & Associates, Land Surveyors
- McElhanny, Civil Engineer
- Skyline Engineering, Structural Engineer
- Talbot MacKenzie & Associates, Consulting Arborists
- Watt Consulting Group, Parking Study

CONCLUSION

The previous staff report concluded that *“due to the scale and massing of the development and the relatively small site size, the proposed land use is inconsistent with the OCP and Fairfield Neighbourhood Plan, which supports lower scale three-storey buildings such as houseplexes, townhouses, additions to existing house conversions or small apartment buildings as opposed to a five to six-storey building with multiple dwellings.”* We feel this revision responds directly to all comments made by Staff, Council and the ADP, providing revised plans for a lower density two-storey houseplex, which will be constructed in the form of a renovation and addition, which preserves the form and character of the site. We feel that this application will provide can breathe fresh air into an aging building, providing thoughtfully designed, sustainable, rental units that will serve the Fairfield community for years to come.

Thank you for reviewing this proposal to redevelop 1042-1044 Richardson Street. If you have any questions or require further clarification of any part of this proposal, please do not hesitate to contact me directly.

Sincerely,



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APPENDIX A: APPLICANT RESPONSES TO STAFF REVIEW & ADP**APPLICANT RESPONSES TO STAFF REPORT (REVISIONS FOLLOWING COTW REPORT JULY 14, 2022)**

Staff Report Considerations (Rezoning Application)	Revisions / Applicant Response
<ul style="list-style-type: none"> • Due to the location of the property and relatively small lot size, the proposal is considered inconsistent with the Official Community Plan, 2012 (OCP) Urban Residential Urban Place Designation, which envisions buildings up to 1.2:1 FSR and three-storeys in height. 	The revised proposal is consistent with the OCP. At 1.1: 1.0 FSR and 2 stories in height it is under the height and densities to be considered in this zone (buildings up to 1.2:1 FSR and three-storeys in height).
<ul style="list-style-type: none"> • The proposal is consistent with the OCP housing policies which support replacement of existing rental units with a rent level secured through a legal agreement and a mix of housing types and unit sizes in all neighbourhoods. 	NO CHANGE REQUIRED: The proposal continues to be consistent with housing policies.
<ul style="list-style-type: none"> • The proposal is considered inconsistent with the Fairfield Neighbourhood Plan, which supports townhouses, houseplexes or small-scale apartments up to three-storeys in height on smaller Urban Residential sites. 	The project has been revised to a houseplex (still rental), which is under three stories in height, which is consistent with the Fairfield Neighbourhood Plan.
<ul style="list-style-type: none"> • The proposal is considered consistent with the Fairfield Neighbourhood Plan policies for the Urban Residential sites in the Rental Retention Area which supports new rental and rental replacement secured with a legal agreement. 	NO CHANGE REQUIRED: The proposal is still consistent with the Fairfield Neighbourhood Plan policies for the Urban Residential sites in the Rental Retention Area. Bonus density is not requested above 1.2:1.0 FSR.
<ul style="list-style-type: none"> • The applicant has provided a Tenant Assistance Plan consistent with the Tenant Assistance Policy. 	NO CHANGE REQUIRED: A Tenant Assistance Plan has been provided as per the Tenant Assistance Policy.
<ul style="list-style-type: none"> • The proposal is for a purpose-built market rental building, which will be secured for the greater of 60 years or the life of the building through a legal agreement, and is therefore exempt from the Inclusionary Housing and Community Amenity Policy 	NO CHANGE REQUIRED: The proposal is for a purpose-built market rental building, which will be secured for the greater of 60 years or the life of the building through a legal agreement, and is therefore exempt from the Inclusionary Housing and Community Amenity Policy.
Staff Report Considerations (Development Permit with Variance Application)	Revisions / Applicant Response
<ul style="list-style-type: none"> • The proposal is inconsistent with the objective and guidelines for Development Permit Area 16: General Form and Character, which encourage new residential buildings to respect the character of established areas through appropriate form and massing that is compatible, unifying, and sensitive to context. 	The proposal has been revised to align with guidelines in Development Permit Area 16. By retaining the existing buildings on the site, the form and character of the buildings will remain, as well as the height of the buildings and massing. Through construction of an addition to the front of the site, the front setback is will become in alignment with the streetscape of Richardson Street. The height of the existing building is among the lowest on the block, surrounded by primarily 3-4 storey buildings.
<ul style="list-style-type: none"> • The exterior corridors and circulation space do not count towards the FSR calculation but do contribute to the bulk of the building. 	N/A: There are no longer any exterior corridors in the proposal.

<ul style="list-style-type: none"> The proposed building height combined with a lack of sufficient setbacks and units oriented in each direction may have a negative impact on the liveability of neighbouring 	<p>The only setback changing in this proposal is the front yard setback which will be brought into alignment with other buildings on the block (it is current out of alignment and context). New Windows added are concentrated towards the street and new side yard of the property.</p>
<ul style="list-style-type: none"> The proposed increase in site coverage and limited open site space limits the opportunity to provide at-grade landscaping and amenity space. 	<p>The existing rear landscaped yard area on site is retained in this proposal. Screening and privacy will be improved between neighbouring sites with the addition of larger trees located in the rear yard. By eliminating the driveway additional trees have been able to be added to the front of the site and boulevard.</p>
<ul style="list-style-type: none"> The proposed parking variance is considered supportable as the applicant is offering car share memberships and usage credits as well as enhanced bicycle parking to mitigate any impact. 	<p>This proposal continues to offer an electric modo carshare vehicle (on street in the same location to serve residents of the proposed development and the community), modo memberships for residents and enhanced on-site bicycle parking amenities. However, with the retention of the existing buildings, no off-street vehicle parking is provided in the revised proposal. An accessible on-street parking space is also proposed. One of the new one-bedroom units is designed to be accessible.</p>

APPLICANT ADVISORY DESIGN PANEL RESPONSES (REVISIONS RESPONDING TO SEPTEMBER 22, 2021 MOTION):

Staff Report Considerations (Development Permit with Variance Application)	Revisions / Applicant Response
<ul style="list-style-type: none"> Variances are not supportable. For example, the proposal has only a third of the site area required in this zone. 	<p>While lot consolidation is not possible in this location, the extent of all variances requested (excluding off-street parking) were significantly reduced in this resubmission as a houseplex.</p>
<ul style="list-style-type: none"> The architectural expression, particularly the stair tower, has a more institutional rather than a residential expression as outlined in the guidelines. 	<p>N/A. The stair tower has been removed from the design. The revised application is for a houseplex, which is clearly residential in form.</p>
<ul style="list-style-type: none"> Open space requirement is 50% and the project proposed 28.7%. 	<p>Open site space for the project has increased to 45% from 28.7%. There is significantly more at grade green space included in this application.</p>
<ul style="list-style-type: none"> Maximum site coverage required is 40% and the project proposed 60.02%. 	<p>Site coverage has been reduced from 60.02% to 55%. The re-design of the proposal centered around retention and re-use of existing structures which resulted in a slightly higher site coverage than would be typical if the project were new construction, which would have been higher if stature. We feel that the lower height off-sets site coverage in this application.</p>
<ul style="list-style-type: none"> Re-examination of the materiality particularly regarding the exterior cladding 	<p>Materiality of the proposal has been revised as per ADP comments.</p>