

July 6, 2021

Mayor Lisa Helps & Council
City of Victoria
1 Centennial Square
Victoria BC V8W 1P6

Re: Rezoning & OCP Amendment Application for Harris Green Village (903, 911 & 1045 Yates, 910 View, 1205 & 1209 Quadra Streets) Development Permit with Variance Application for Phase One of 1045 Yates Street

Dear Mayor Helps & Council:

On behalf of Starlight Developments, we are pleased to provide this letter that (A) captures the prominent features of the development (OCP+RZ) application, summarizes key changes made over the past 18 months in working with City staff to refine and improve the project, and (B) outlines the request for a Development Permit with Variance. The revised submission incorporates City staff comments and includes the design team's in-depth analysis of the current *Downtown Core Area Plan* (DCAP) and new draft *Downtown Design Guidelines*.

The OCP and Rezoning application involves two sites on the south side of Yates Street: the entire 900-block of Yates Street and the east half of the 1000-block of Yates Street. This application will significantly shape the urban form of the Harris Green neighbourhood, provide new public space, fill a need in the rental housing market, and provide new-build commercial spaces for important local businesses to continue serving the community into the future. Notably, the project plans allow for phasing of development to mitigate transition impacts for current tenants and residents.

A recent report to City Council about the "Future Housing Needs and Gaps in Official Community Plan Capacity" (June 24, 2021) states that "a capacity assessment reveals gaps in the City's ability to meet these needs based on the Official Community Plan Urban Place Designations... and there is shortfall in overall capacity". The report also reiterates the City's policy of targeting 50% of future population growth to the Downtown Core Area, which includes Harris Green. This project's proposed addition of more than 1,500 residential units will significantly address this gap in the rental housing supply. There have been comments about the size of the project, but scale is a benefit - achieving significant rental housing supply and unique urban design and public amenities that would not be possible on a series of partial-block developments.

The overall project application includes a Rezoning and OCP application for the entire site and a Development Permit with Variance application for Phase One, which will take place on the east half of 1000-block of Yates Street (currently the Harris Chrysler Dealership). Therefore, for clarity, this letter has been divided into two parts: (A) Rezoning/OCP application for both the 900 and 1000-block of Yates Street, and (B) a Development Permit with Variance application for the east half of 1000-block of Yates Street.

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A. Rezoning/OCP Amendment Application

Project Overview

The two sites represent a total of 19,864 m² (just under two hectares or approximately five acres) in Downtown Victoria, and will have four primary uses:

1. Residential, all in rental tenure;
2. Commercial retail;
3. Commercial office; and
4. Public plaza and open space.

At build-out, the project will provide more than 1,500 purpose-built residential rental units, 10,500 m² of commercial retail or office space, and 3,600 m² of amenity space that includes about 500 m² allocated for daycare. A total of 119,500 m² of floor space is planned to be developed in three phases. There will be a combination of larger format retail to accommodate a grocery store, for example, and small shops, cafés, and restaurants at ground-level with some office space above. There is also potential to accommodate a small boutique hotel on the 900-block to complement the mix of uses and activities for a more vibrant, active, and integrated neighbourhood.

Harris Green Neighbourhood: Land Use Policy & How the Project Fits

The Harris Green neighbourhood is identified in the *Official Community Plan (OCP)*, and other planning documents, as a dynamic, vibrant, and complete neighbourhood that is earmarked as the City's primary population growth focal point – 50% of all future population growth is targeted to Harris Green and the portion of downtown that can accommodate growth.

Policy recognizes that higher density neighbourhoods will reduce environmental and climate change impacts by supporting active transportation and lessen pressure on both greenfield development in the region and reduce the need for redevelopment of Victoria's traditional residential neighbourhoods. This project's 1,500+ residential units will contribute to the economic health and vitality of the Downtown Core, Old Town, and Inner Harbour precincts.

Aligned with the City's objectives for encouraging population growth in the neighbourhood, this project can be a significant catalyst to Downtown's post-pandemic regeneration and economic growth.



Project Amenities & Benefits

The size of the assembled parcels creates opportunity for comprehensive urban design and extensive public amenities which cannot be achieved by individual developments of smaller parcels like those previously built or underway downtown and in the Harris Green neighbourhood.

The most exciting amenity in this project is a signature public space in the centre of the 900-block of Yates Street. This half-acre (0.2 ha) sized plaza and park space will be available to current and future individuals and families living and working Downtown and in the rest of the region, as well as to visitors to Victoria. There is a grassed area for casual enjoyment and where children can play, as well as more urban, flexible spaces for community gatherings and for people to meet and sit in pleasant, landscaped surroundings. It is the most significant new piece of open space to be developed in the urban core in decades and combines opportunities for both active and passive activities.

Key amenities and benefits of the project include:

- Approximately 1,500 rental units at full build-out, which will increase Victoria’s rental housing stock; improve supply, choice, and flexibility for individuals and families; and assist with chronically low rental vacancy rates;
- A range of unit sizes and types (studios to three-bedroom units, including ground-oriented townhouse units) for individuals, couples, and families;
- Regionally significant public space that includes a vibrant “Yates Street Plaza,” a terraced area with amphitheatre seating, and “View Street Green,” which is substantially larger than the amount of open space and public realm amenity suggested in the *Downtown Core Area Plan* (DCAP);
- Children’s daycare and associated outdoor space;
- Enhanced street animation and pedestrian connections between and within streets;
- Corner plazas and unique public spaces;
- Extensive on-site amenities for tenant residents;
- Model stormwater management and raingarden systems;
- Comprehensive integration of landscaping elements within the site, and connectivity with the streetscape, pedestrian sidewalks, and boulevards;
- Accommodation for a separated bike lane along Yates Street; and
- Comprehensive TDM measures, including Modo carshare spaces and bike facilities.



Project Data Summary

The following table summarizes the main project parameters. Please refer to the Project Information Table in the Rezoning Booklet for greater detail.

Description	900-Block	1045-Block	Total
Site Area	13,527 m ²	6,337 m ²	19,864 m ²
Floor Area	81,162 m ²	39,137 m ²	120,299 m ²
Floor Space Ratio	6.0	6.20*	6.06
Height (maximum building height incl. rooftop structures & mechanical)	111.34 m	77.96 m	N/A
Storeys (Tower heights, number of habitable storeys, excl. rooftop structure & mechanical)	32, 29, 28	21, 20	N/A
Site Coverage (%)	71.6	84	N/A
Open Site Space (%)	28.4	12	N/A
Parking Spaces	Per Schedule C or as varied at time of Development Permit with appropriate TDM measures		
Bike Parking (LT/ST) Spaces	1,468	657	2,125
Total Number of Units (Approx.)	1,058	510	1,568
Unit Type	Studio, 1/2/3 Bedrooms, Townhouses		

*FSR above 6.0 associated with enclosed at-grade grocery store loading zone and multi-stream waste and recycling handling

Urban Design Rationale for Height, Massing & Density

As a result of 18 months internal discussions and communications with City staff, a great deal of attention has been paid to achieving the most successful relationship between the height of the podium height and the towers, relative to their effects on the streetscape, pedestrian experience, and shadowing. After a detailed analysis, including sun and shade performance, the podiums have been sculpted, podium height reduced, and setbacks at street level increased.



The slimmer, taller tower and podium typology allows for a more sensitive relationship with the street, block, and neighbourhood. Updated design principles focus on 1) framing the street, 2) sculpting the podium, 3) strategic placement of height, 4) splitting the blocks to prevent long continuous frontages, and 5) adding to the neighbourhood green space and public gathering areas. This conscious urban design decision is why the application includes a separate *Urban Design Manual* prepared by D'Ambrosio architecture + urbanism, that sets out the design parameters for achieving a high-quality urban form. The design recognizes the initiation of changes to the Downtown Core Area Plan (DCAP) design guidelines currently in progress.

The elimination of podium floors in turn reduced floor space, which has been redistributed to the towers to mitigate impact. It has been demonstrated that adding height to towers offers a far more successful outcome than having shorter, squatter towers with higher podiums and street walls – there will be much less impact to the street and neighbouring buildings.

The result of this thorough analysis is the reason there are only five (5) towers in one and one-half City blocks. On many other blocks in the Harris Green neighbourhood, one can find as many as five towers on one block, with more to come. This analysis also supports the tallest building (at 32 habitable storeys) being in the centre

of the 900-block site, from which the buildings terrace toward the edges with two additional towers at 29 and 28 storeys. The 1000-block contains two smaller towers of 22 and 21 storeys oriented toward Yates Street, and a 20-storey building closer to Cook Street.

Harris Green Plaza

During the public consultation process the majority of the comments spoke to the lack of open space and useable public space in the Harris Green neighbourhood. This feedback has resulted in concentrating our efforts to provide meaningful public open space amenities.

The key amenity of the project is the central plaza and green space, located in the middle of the 900-block of Yates Street, that will run mid-block from Yates through to View Street. Measured to the building frontages framing the plaza (but excluding townhouse patios), the total area is 1,982 m² (21,334 sf). If some of this space is used for outside seating or display area for shops and food outlets that may line the plaza, the minimum anticipated fully public realm space will be at least 1600 m². This space is significantly larger than what is contemplated in the DCAP policies, which suggests a plaza between 800 and 1,200 m².

The revised *Rezoning Booklet* provides much greater detail on the plaza, which has been programmed to permit a variety of activities, and include urban piazza forms and soft lawn landscape features. The plaza takes advantage of the elevation changes between the two streets to create three distinct program areas that will allow for a variety of experiences within the space. The upper Yates Street area combines feature sculpted design elements, specialty paving, and raised planters with specimen trees and seating. The middle section, referred to as the “Harris Green Terrace”, combines seat steps and raised planters. The lower “View Street Green” area combines lawn, raised planters, and platform seating. The plaza in its entirety provides an excellent opportunity for public art. Starlight welcomes working with the City of Victoria to determine the best programming for artwork of various forms in this open space.

Affordable Housing

Starlight recognizes Victoria is challenged by the lack of housing supply (with one of the lowest vacancy rates in Canada), and housing affordability relative to local incomes. In addition to the entire development providing market rental housing, Starlight has sought to include a viable affordable housing component. With current construction costs, it is difficult to make private sector rental projects work financially in addition to the significant contributions being made to the installation of amenities for the public.

As part of this development, Starlight is proposing an additional 0.5 FSR of residential floor area beyond what the DCAP has contemplated for these sites (from 5.5 to 6.0 FSR). This additional residential floor area will make it possible for Starlight to include some affordable rental units in the development – twenty-three (23) units will be offered at median income affordability per the *Victoria Housing Strategy 2016-2025, Phase Two: 2019-2022* report. The affordable units will be offered in the first phase of development to maximize public benefit.

Tenant Assistance Plan

In the 900-block Yates Street phase of development, which is at least three years away, one small 15-unit rental building will be redeveloped. A Tenant Assistance Plan has been submitted to the City well in advance of development of this site. Prior to Public Hearing, an updated TAP will be provided to staff, including confirmation that tenants have read and understood the TAP and have been provided with an opportunity to identify their needs and request additional assistance. Tenants will be given the right of first refusal and compensation consistent with policy.



Bike Lanes

An important element added to the public realm amenities is a new separated bike lane along Yates Street. Vancouver Street bike enhancements have already been implemented. Yates Street bike lanes have been prioritized and advanced with the Harris Green Village Project. Curbing, boulevard treatment, street lighting, street furniture, and on-street parking have been designed accordingly.

Traffic, Parking & Transportation Demand Management Analysis

Given the proximity to Downtown, the integration of the development's residential and commercial space, and the growing intention of people who live Downtown to minimize vehicle ownership, a greater emphasis on shared transportation initiatives is important.

A parking study, prepared by Watt Consulting Group, analyzes bylaw standards and sets out Transportation Demand Measures (TDM) that result in proven reductions in parking demands. Chief among the TDM measures to consider are bicycle parking stalls and facilities (including end-of-trip cycling facilities for employees), electric bike parking, and carshare (e.g. Modo). It is noted that families are increasingly using cargo bikes, which have greater space requirements, but are proven substitutes to private vehicle ownership and usership.

Each phase of development will be subject to a Development Permit, at which time specific parking requests and any variance from Schedule C parking requirements will be detailed. The Watt Consulting report will be used to guide the size and extent of TDM measures appropriate for each phase.

The consulting transportation engineers have also reviewed and updated schematic plans to accommodate traffic signalization at Cook & View Streets, and a separate left-hand turn lane at Quadra and View Streets.

Phasing & Timing

The project will be phased to allow for smooth transitions and limited disruption to neighbours and existing tenants. The first phase will be the development of the east half of 1000-block of Yates Street in the location of the Harris Chrysler car dealership. Phase Two will be the 900-block of Yates Street, and be divided into two sub-phases: the east half and west half of the property. Phase One is anticipated to start in late 2021. The two subsequent phases will be tied to the completion of Phase One. A summary of the Phase One Development Permit application is addressed below.



B. Development Permit with Variance Application for Phase One (1045 Yates Street)

Project Description Background

This project is predominantly residential rental, with ground-oriented retail and second floor childcare space. The plans envision 33,976 m² of residential space, comprising 510 units in a full mix of unit sizes and types, including ground level townhouse units along the View Street frontage. An enhanced corner plaza space, at the prominent intersection of Yates and Cook Streets, provides a strong public realm presence and a gateway expression at this important corner. Expanded public realm space has also been added to the corner of Cook and View Streets. A residential lobby is located on each of Yates and Cook Streets.

Commercial space, totaling 3,052 m², is situated along Yates and Cook Streets, and partitioned into small-to-medium commercial units, with one large format commercial space. This configuration will allow for a range of shops and services at street level. Development Permit plans allocate 482 m² for daycare space, located on the second floor along the Yates Street frontage, with access to a children's outdoor play space. The final

programming and size of the daycare space will be developed and in conjunction with the future operator, and the size of the space may be adjusted depending on the daycare provider's needs.

The building frames the surrounding streets and serves to anchor the eastern gateway to Harris Green and downtown. The redevelopment of the site, on what is now a large, paved parking area and aging single-storey automobile service building, will complete the built form for the block. The project information table below reflects the revised plans:

PROJECT INFORMATION TABLE	
Zoning, Existing	R-48, S-1
Site Area	6,377 m ²
Total Floor Area	39,289 m ²
Residential Floor Area	33,976 m ²
Commercial Floor Area	3,052 m ²
Day Care	482 m ²
Floor Space Ratio (rounded)	6.20 *
Site Coverage	84%
Open Site Space	12%
Max Building Height (incl. rooftop structure to top of parapet)	78.42 m
Tower Heights (number of habitable stories not incl. roof mechanical & roof access)	21 & 20
Parking Stalls (required: 433)	348
Bicycle Parking (short & long term; required = 657)	657

*FSR above 6.0 associated with enclosed at-grade grocery store loading zone and multi-stream waste and recycling handling



Unit Mix

The project includes 510 residential units in a mix of unit types, with 32% as two- and three-bedroom units, including six townhouses fronting View Street.

Studio	1-bdrm	1-bdrm + den	2-bdrm	2-bdrm + den	3-bdrm	TH (3-bdrm)
43	223	80	82	64	12	6

Urban Design Expression

The design provides a perimeter block of building, which creates a pleasing street façade and features two slender towers. While simple in form, the towers are varied with balconies, which evoke a sense of movement

and rhythm. Tower heights are differentiated, with the taller tower located on the west side toward Yates Street and the shorter tower sited on the east side toward Cook Street. Both towers are substantially setback from the street. There is a 24-metre separation between the two “on-site” towers, and the same separation between the westerly tower face and the closest adjacent tower existing on the “Regents Park” property to the west.

Cascading podium levels sculpt the building and optimize solar performance for the public realm, achieving a comfortable building scale. The corner plaza at the Yates/Cook Street intersection has been further enhanced to expand the public realm, and will complement a similar plaza strategy planned for the approved development on the north side of the intersection.

The ground floor is predominantly retail and/or food-service space on the Yates and Cook Street frontages. Architecturally, the exterior treatment has been revised to introduce a much stronger brick element along the frontages to complement the ground floor glazing and improve the storefront rhythm.

Along View Street, the ground floor has a series of at-grade, two-storey townhomes, as well as parking and loading access. Loading, freight handling, solid waste, and recycle centre areas are fully enclosed.

Continuous weather protection along retail frontages provides pedestrian comfort and opportunities for signage. Special feature canopies at main entrances provide a visual hierarchy and sense of arrival. The concept of “eyes on the street” is supported by continuous retail, lobbies, and townhomes, helping to promote security and comfort for the neighbourhood.

Major design enhancements include:

1. Reduction of podium heights from a six-storey street wall to a four-storey street wall along Yates Street, with the fifth floor set back 2.4 metres (8 feet) from the street wall;
2. Substantially reduced podium heights along the View Street frontage that now read as three-storeys;
3. Both towers increased in height by two-storeys to maintain the floor space removed through the reduction in podium heights;
4. Additional pronounced vertical demarcation in the façade podium walls to soften massing along the Yates Street frontage;
5. Boulevard landscaping and civil design refined to accommodate future cycling infrastructure; sidewalks have been widened;
6. Use of brick along the full frontage of all street walls, with stronger vertical brick elements carried through from street level to the fourth floor podium. The fifth floor is set back, and incorporates muted colours to blend into the horizon, thereby accentuating the brick elements of the four-storey façade;
7. Different colours of brick along the street frontage to create the visual impression of distinct buildings, which is more characteristic of the Downtown building form;
8. Changes in the colour palette and materials of the towers, as well as refinement of the rooftop overhang on the towers, to create a more elegant and attractive skyline;
9. Relocation of all bicycle parking to the first underground level for easy access; and
10. Purchase and placement of three Modo carshare vehicles.



Landscaping & Rain Gardens

The landscape design proposes to prioritize green infrastructure. Rain gardens will be prominently featured on Yates Street, and will not only function as a means of capturing and containing rainwater run-off from the sidewalk, but also as a neighbourhood amenity that enhances the public realm. An overall increase in the number of on-site and boulevard trees will further enhance the urban forest of the neighbourhood, as well as promote infiltration, offer water quality benefits, and reduce peak flow during storm events. The significant existing horse chestnut trees on Cook Street will be protected to further support the urban forest.

Landscape plans have been updated to include revised planting materials, with additional at-grade planting beds, relocated benches to provide an edge for the planting beds, and changes to the boulevard height to allow for the future Yates Street bike lane.

Lush roof terrace plantings will provide inviting spaces for residents. Outdoor amenity space for residents includes an outdoor kitchen and dining area, enclosed dog run, and informal play areas for children.

Shared Property Line

The west wall of the building on View Street is sited at the property line, and provides privacy and noise attenuation from the commercial loading zone and solid waste recycle centre. One ornamental plum tree on the neighbouring property is located virtually on the property line, and has a root zone that spreads over the property line. The arborist advises the tree be removed and replaced.

Specific attention has been paid to the west wall, incorporating landscaping and a sculpted wall pattern to enhance the exterior appearance. Starlight has had various communications with its neighbours, and has committed to working with Regents Park to install replacement trees and landscaping along the easterly property line.

Project Benefits & Amenities

Project benefits and amenities remain unchanged, and are briefly described below.

- Affordable Housing (23 units) is proposed within the first development phase, to maximize public benefit.
- Daycare Space is located on the second level of the Yates Street frontage, with a total interior area of 482 m², plus associated west-facing outdoor space. The final size of the space will be confirmed with the operator of that space. A separate elevator accesses this space, and also provides access to the ground level, as well as P1 commercial and visitor parking.
- Corner Plaza Space is provided at the prominent intersection of Yates and Cook Streets, and a smaller urban space expands the public realm at Cook and View Streets. The ground level exterior walls are set back three metres from the street property lines. Incorporating “new town paving standards”, this design element that transitions into the public sidewalk will evoke a feeling of spacious, comfortable public space, with ample room for street activities and outdoor restaurant seating.
- Resident Amenities. A variety of resident amenities are proposed, including:
 1. A substantial central courtyard on the second floor of the podium, with pavers and lush planters. Amenities within the courtyard include an outdoor kitchen with barbeques, benches, moveable tables and chairs, and a children’s play area. The courtyard will complement the surrounding interior



amenities, and allow for flexible programming for events and as tenants needs and preferences change over time;

2. Interior amenities include a gym and fitness studio, change rooms, a multi-purpose/social room, and co-working and study spaces – all fronting onto the courtyard space; and
3. Three additional outdoor recreation spaces at various podium roof levels, including a dog run and additional outdoor seating.

- Economic & Environmental Benefits include:

1. More than five hundred residential units will significantly expand Victoria’s apartment rental inventory, and become a stabilizing influence on rental rates by providing much needed rental housing to the market.
2. Based on the Economic Policy Institute’s estimates for 2019, which states 5.5 direct jobs, 4.8 supplier jobs, and 6.1 induced jobs are created per \$1 million in construction value, it is estimated this project will generate approximately 260 construction and construction-related jobs per year during construction.
3. Generating a sizable tax base, with direct tax revenues to the City estimated in the order of \$1 million annually.
4. Residents occupying the 500+ residential units will significantly contribute to the vitality and financial health of Downtown retail shops and other local businesses.
5. Living, working, and recreating in Downtown reduces dependency on vehicle transportation, prompting positive economic and environmental benefits.

Transportation

A parking variance, summarized below, is requested. Bicycle parking meets bylaw requirements and includes outlets for e-bikes. Separate bicycle storage and end-of-trip facilities have been provided for commercial tenants.

Parking is located underground, and service access for commercial units, garbage, and recycling is located at ground level, but within the building envelope, and enclosed from exterior view. Access to the parking and service areas is via View Street. Changes in design now provide for a buffer area between the entrance leading to underground parking and the entrance leading to the service area; this arrangement will create a safer pedestrian experience. Additional changes include movement of bike parking to P1 from lower levels, reducing internal travel distance.

A series of Transportation Demand Management (TDM) measures will be implemented to encourage alternate transportation choices to private vehicle use. The following TDM measures are proposed:

- Three Modo (carshare) cars purchased and placed on-site;
- Two EV stations for commercial and visitor parking;
- EV load share provided in the residential parking to support 90 stalls;
- All bicycle parking located on the first floor of the underground parking for convenient access, with 25% of bike spaces having access to an electrical outlet for e-bike charging;



- Commercial end-of-trip bike facilities provided to encourage employees to use active transportation between their home and workplace; and
- Multi-modal wayfinding signage to help direct and orient residents, employees, and visitors to transit, bike share, car share, bicycle parking, and amenities.

Environmental Features

Environmental features have not changed since the original DP submission, and are reiterated below for convenience:

- As a mixed-use, transit-oriented project, the development will provide a local option for housing, shopping, and leisure, as well as a childcare facility to support the growing community;
- The urban infill nature of the project adheres to the principle of promoting development on existing urban sites, diverting development pressure from greenfield locations, and making more efficient use of existing infrastructure;
- The project supports a high degree of walkability and cycling access to nearby amenities for residents, thereby reducing motor vehicle trips;
- Carshare and load sharing EV stations are provided to reduce CO₂ emissions;
- Extensive bike parking, lockers, and a bike repair station are provided;
- Landscape and stormwater management strategies, including partial green roofs, will retain and infiltrate rainwater, limiting post-development peak water run-off from the development.

In order to reduce the urban heat island effect, improve building performance, and reduce CO₂ emissions, the project design will implement the following measures:

- All parking is underground;
- Roof-top terraces with community gardens and garden beds provide opportunity for residents to engage in urban agriculture;
- A mix of unit types for various styles of living, with access to balconies and/or large terraces on roof decks, provide all with access to views and the outdoors;
- Large windows in living room areas increase natural lighting, provide views, and improve wellbeing;
- Outdoor water conservation strategies include water efficient landscaping. The project aims to achieve an overall reduction in water use by specifying efficient fixtures;
- Wildlife-resistant recyclable material storage facilities accessible to all property users;
- Ventilation supply and distribution designed to satisfy the requirements of ASHRAE standards, and include ensuring ventilation is supplied to each suite and adequately distributed to each occupied space;
- *BC Energy Step Code Level 2*. Passive envelope strategies reduce reliance on mechanical systems. Glazing percentage targets 50% window-to-wall area for the towers to minimize glazing heat loss and heat gain into each unit;



In Closing

This letter summarizes the key changes made since the previous submission and highlights the major design elements of the proposal. The *Urban Design Manual* and *Rezoning Booklet* provide both visual and more detailed written descriptions.

A separate Development Permit Application for Phase One is being submitted concurrently with this resubmission of the overall development proposal. The plans adopt the guidelines and directions contained in the updated *Urban Design Manual* and *Rezoning Booklet*.

The intention of this application is to facilitate a vibrant development that complements the character of the existing Harris Green neighbourhood while providing significant purpose-built rental housing, a mix of uses and building forms, and important public open spaces. This is an exciting and significant project that will positively shape the future of the neighbourhood and Downtown Victoria.

We look forward to working collaboratively with the City on this special opportunity to enhance and make better use of a significant Downtown location while responding to the need for rental housing in Victoria.

Should you require any further information about this application, please do not hesitate to contact me at 250.383.0304 x 122 or dstrongitharm@cityspaces.ca.

Sincerely,



Deane Strongitharm, RPP, MCIP



Attachs.

Cc: Andrew Browne, Starlight Developments