



LOW
HAMMOND
ROWE
ARCHITECTS

May 12, 2025

Attn: Rob Bateman
Planning Department
City of Victoria
1 Centennial Square
Victoria, BC

re **REZ00887 and DPV00288 - 824/826 Alston Street, 210/212 and
220/222 Langford Street Rezoning and Development Permit Application**

1. Development Services Division Comments

Development Permit Area 16: General Form and Character

• The proposal is in Development Permit Area 16, General Form and Character. Please consider the following design changes to improve the application's consistency with the objectives and guidelines associated with this DPA:

- providing private decks for the dwelling units.

LHRA: Private patios have been provided to all Level 1 units. Private decks for upper floors are not provided for maintenance issues. A large outdoor amenity deck has been provided on the 6th floor and generous outdoor courtyard space on Level 1. The goal is to provide communal space for the residents to connect and be part of a vibrant residential community.

- providing more common indoor amenity space for the residents.

LHRA: Based on BCH's funding program and requirements of achieving efficiency in floor areas, we are limited to the Indoor Amenity area provided on the 6th floor.

- using the roof for common outdoor amenity space, green roof, and/or solar panels.

LHRA: The roof will be reserved for the potential of solar panels to be installed in the future. Green roofs are not permitted in BCH projects. A generous courtyard amenity space has already been provided above the parkade roof and a common outdoor deck has been provide on the 6th floor.

- relocating the PMT from the corner of Langford and Alston to next to the parkade entrance to make it less prominent. The building entrance area could then be enhanced with features such as seating or bike parking.

LHRA: The space adjacent to the parkade entrance is designated for Garbage/Recycling Staging area. CoV Engineering Department has confirmed this is required. PMT has now been relocated to Alston to make it less prominent. PMT installations have very specific requirements which restricts the location.

- providing more visual interest on the south facing blank wall near the property line, such as climbing plants.

LHRa: The design intent for the whole building is to provide some relief at the end of the buildings as the colours and textures have been wrapped around the larger walls facing the streets and courtyards visible to the neighbourhood. Climbing plants are a maintenance issue and has been proven to not work well in our climate.

- obscuring and/or reducing the size or number of windows onto living space on the south façade adjacent to the property line.

LHRa: We have minimized the number and size of windows on the south side to only one from a suite. The other windows is from the corridor and is not a regularly occupied space.

- reducing the height and/or stepping back the upper storeys to reduce the perceived massing and help transition to the surrounding smaller scale buildings.

LHRa: The top floor suites facing both Alston and Langford has been stepped back by 610mm
As the floors facing the courtyard is stepped back from the property lines a significant distance, we have kept the construction efficient and affordable by stacking those units.

- Please provide the following additional information to assist with the application review:

- Street Elevation showing the proposal in the context of adjacent buildings along Alston Street.

LHRa: Please refer to attached revised DP drawings.

- Additional 3D renderings providing views of south side of the development from the ground level on the public street.

LHRa: Please refer to attached revised DP drawings.

- Updated letter to Mayor and Council to reflect revised proposal as needed.

2. Engineering and Public Works Department Comments

3. Transportation Review

The standard right-of-way for a local street is 18.0m. To help achieve this width, a dedication of 1.39m will be required as a condition of building permit. Alternatively, if the applicant is supportable of a closure of Alston Street adjacent the site and willing to replace the need to construct standard local road frontage improvements with the alternative solution recommended by staff in a letter dated November 22, 2024 this dedication may not be required. Confirmation from the applicant if they are willing to be financially responsible for the design and construction of the alternative solution is required. List any items to be addressed on the drawing prior to COTW

Please remove all parts of the building and the proposed PMT from the highway dedication. This condition may be removed if the alternative frontage works including the pathway on Alston are advanced. A plan revision is required.

Please remove the dashed lines around each bicycle parking stall. A plan revision is required.

LHRA: Parkade Plan A201 has been updated with dashed lines removed.

Parks Division Comments

General

- Applicant's project arborist to undertake exploratory excavation on the Alston St frontage to confirm if there is appropriate soil depth and volume for tree planting between the property line and the sewer main.

- o Depending on the outcome of the exploratory work, pathway connections from patios to the right-of-way may need to be shifted to accommodate both municipal and private trees west of the multi-use pathway on Alston.

- o Please contact Taylor at Parks to discuss exploratory scope of work.

- Include the following frontage improvements on Alston St:

- o Remove trees M369 and M368.

- o Grade changes on the boulevard must be minimized.

- All new municipal trees shall be procured and planted by the applicant to City of Victoria standards.

- Please confirm shoring or cut slope to be used for the excavation within the root zone of tree 353 and provide the project arborist all relevant information.

Arborist Response: Reached out to CoV to determine scope of work since the change to common frontage rather than MUP. M369 and M368 has been noted as removal due to request and conflicts with PMT access. Talmack has indicated the excavation within the critical root zone of 353 shall be shoring or another suitable method to limit over excavation.

Civil Plan

- Please show a separate water service on the site servicing plan for irrigation for the proposed trees in the boulevard. Please have the water service teeing off from the main water lateral. Installation of the water service to be at the expense of the applicant. Irrigation will be for trees only.

- o An irrigation sleeve will be required under any hard surfaces.

- o Irrigation must meet the Standards for Irrigation Installation set out in the City of Victoria Supplementary Specifications for Street Trees and Irrigation, Schedule C, to Victoria Subdivision and Development Servicing Bylaw.

Civil Response: An irrigation is now shown teeing from the main service lateral to support proposed boulevard trees. Irrigation sleeves are shown schematically and will be finalized during detailed design.

- Please shift BC Hydro conduit and other infrastructure out of the boulevard into the sidewalk or road. Ensure there is adequate spacing from other infrastructure as required.

Civil Response: BC Hydro and utility alignments have been shifted to be shown under sidewalk. Alignments are conceptual and will be coordinated with the appropriate approving authority during detailed design.

Replacement Tree Plan

- Please ensure all servicing (water, storm, sanitary, gas, telecom, hydro, etc.) above and below ground on both private property and city property is reflected and labelled in accordance with the Civil Plan.

MDI Response: Servicing is now shown on L0.02

- Chamaecyparis nootkanensis 'Pendula' trees count as a Part 1 medium tree due to the height at maturity reaching over 10 m. If they are to be counted as Part 1 replacement tree, please ensure soil volume and siting requirements are met.

MDI Response: Chamaecyparis is now counted as a medium tree on L0.02

Arborist Report

- Include photos of inventoried trees.
- Please revise tree DBH measurements to reflect diameter at 1.4 m from grade. If there are multiple stems at 1.4 m, add 100% of the three largest stems for the total DBH.
 - o Tables and other parts of the report should be updated accordingly.
- Please remove the 'Net Change' column from the Tree Impact Summary Table and revise columns 'C' and 'D' to N/A for the Municipal Tree row.
- Coordinate with applicant to confirm shoring or excavation for excavation within root zone of tree 353 and update or confirm retention status accordingly.

Arborist Response: Attended site to collect site photos and verify DBH measurements. Changes to Tree Impact Table have been completed. Indicated the excavation within critical root zone of 353 shall be shoring or another suitable method to limit excavation

Tree Management Plan

- Please include grading points along the property line on the west side of municipal tree M370.
- Ensure all proposed and existing servicing is reflected including overhead hydro lines and the sewer main along the Alston St frontage.

- Bar scale provided is not accurate, please revise.

Arborist Response: Requested features have been included in revised TMP. Scale bar has been reviewed.

Recommendations/Information

- It is recommended to select alternative tree species for Planting Areas 1, 2 and 3, in alignment with the "Right Tree, Right Place" planting principles. At maturity, Katsura (*Cercidiphyllum japonicum*) trees can reach a canopy spread of over 10 meters. Given the proximity of the proposed planting locations — approximately 1.7 meters from the building overhang, ~2 m from the building foundation, and ~3 m from overhead hydro lines, there is a considerable potential for future conflicts between the trees and the building/building overhang.

MDI Response: Katsura trees are revised to a narrower tree.

Building and Inspection Services Comments

- Designer to ensure for the spatial separations calculations that are close to the maximum permitted, that the vents and alike are considered in the calculations as they could go over the permitted.

LHRa: Vent sizes and locations have been relocated to minimize impact on elevations closest to limiting distance.

Sincerely,

Low Hammond Rowe Architects Inc

A handwritten signature in dark ink, appearing to read 'J. Low', with a stylized flourish at the end.

Jackson Low, Architect AIBC
Principal