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Note: Changes from the previous submitted version of this document (dated Feb 21/24) are highlighted with pink text.

Please also see

Resubmission Response Letter for discussion of these changes.

November 15, 2024

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

Re: **Heritage Alteration Permit with Variances and Rezoning Application for a Comprehensive Development Urban Design Plan at 780 Blanshard Street (HAV00034 in conjunction with REZ00825)**

Dear Mayor Alto and Council:

The Office of McFarlane Biggar Architects + Designers (**omb**), on behalf of Reliance Properties, is pleased to present this letter and enclosed documents to describe the heritage alteration and rezoning concept for 780 Blanshard Street, legally described as lots 1, 2, 3, 4, 28, and 29 of section 88 and of lot 1627, Christ Church Trust Estate, Victoria, Plan 35B.

The goal of this project is to rehabilitate, and ultimately designate, the existing heritage structure, revitalize the site and surrounding public space, and construct a new addition to the heritage building. A mixed-use program is proposed: a 96-room hotel with a public café in the renovated heritage building and a 98-unit condominium residential addition. The proposed FSR is 4.6 and Height is 64.2 m.

Considerable additional information about this proposal, including a detailed project rationale, can be found in the **Large Project Supplementary Information Booklet** included with the submission materials.

Site Context

The 2,272 m² site is unique in the city. It is a steeply sloping triangular 'island' lot at the southeast corner of downtown. The site is bordered by Blanshard Street, Burdett Avenue, and Fairfield Road. Immediately adjacent to the west is a small municipal park, Penwill Green, which is contiguous with the landscape of the site. The most prominent feature of the site is the British Columbia Power Commission Building, a heritage-registered late Art Deco-styled cast-in-place concrete structure (completed in 1950).

Project Vision

The intention for this project is to revitalize an important existing site within downtown Victoria in a way which makes the most of its opportunities and addresses its challenges with a thoughtful, responsible, sensitive, and viable approach. The team envisions a new development that: restores an important heritage building, strengthens the urban network, improves the surrounding public realm, renews the adjacent municipal park, supports expanded public transit infrastructure, and ultimately helps create a more vibrant, resilient, and diverse community.

*See also 02 Historical Analysis, 03 Urban Analysis, and 04 Site Analysis in the **Large Project Supplementary Information Booklet**.*

Description of Proposal

Architecture + Heritage

For additional information on the architectural design and heritage approach see:

- **Heritage Conservation Plan** by CDS.
- **Heritage Impact Assessment** by CDS.
- **Seismic Upgrade and Heritage Impact Assessment** by RJC Engineers.
- **01 Design Rationale in the Large Project Supplementary Information Booklet.**

The point of departure for the architectural design is the guidance on the rehabilitation of historic buildings (Standards 10, 11, and 12) offered in the *Standards and Guidelines for the Conservation of Historic Places in Canada*. The rehabilitation of the BC Power Commission building is detailed in a conservation plan prepared by the heritage consultant, Community Design Strategies (CDS), which is included in the submission package. A heritage impact assessment has also been produced by CDS and is further supplemented by a structural seismic upgrade and heritage impact assessment produced by RJC Engineers.

The principal rehabilitations to the façade will include:

- The removal of the unoriginal exit stair which was added to the building in the 1970s.
- Restoration of the original paint colours based on the heritage consultant's investigation.
- Retention of significant character-defining elements, like metal window screens and corrugated glass.

As articulated in detail in the submission materials, the addition to the historic BC Power Commission building takes the form of a slender tower with a direct formal relationship to the building below. The tower floor plate respects the heritage building's footprint. The fifth storey—the first above the existing heritage building—is set back from the existing parapets to preserve the visual integrity of the heritage structure. The result is a horizontal base building whose historic character remains distinct, and a new vertical massing that minimizes the impact on the heritage structure.

The cladding, fenestration, and balcony strategies employed on the addition take cues from the existing building's form and detailing and reinterpret them with a contemporary expression.

On the interior, character defining elements like the historic Chairman's Office and west exit stairwell are being preserved. Heritage fittings and finishes are also proposed to be reused where practical.

Landscape Architecture + Public Realm

Contingent on a Land Lift analysis and agreement with the City on the scope of community amenity contributions, the project proposes several potential landscape and public realm improvements on and around the site. Together, they represent an opportunity to activate the site and the park to make a significant contribution to the neighbourhood. These improvements include a redesigned Penwill Green Park, public access to the Blanshard Street multi-modal entry plaza, an enhanced Burdett Avenue streetscape, programmatic activation along Fairfield Road, and on-site gardens and accessible roof decks.

Government Policies and Design Guidelines

This application proposes to change the zoning for the site from CBD-1 to a new Comprehensive Development (CD) zoning. The intent is to meet the core objectives and principles in the Official Community Plan, Downtown Core Area Plan, and other applicable guidelines in a way that suits the specific urban design considerations of this challenging site.

The proposed land use, a commercial hotel with multiple dwelling residential, is consistent with the current CBD-1 zoning.

Density

The development proposal has a total Floor Area of 10,439 m², comprised of 3,356 m² of commercial hotel space and 7,083 m² of residential space for a FSR of 4.6 to 1 (1.5 commercial, 3.1 residential). In the OCP, the site is within the Core Business Urban Place Designation of the Urban Core planning area, which permits a maximum residential floor space ratio of 3:1 and total commercial floor space ratios ranging from a base of 4:1 to a maximum of 6:1. In the Downtown Core Area Plan (DCAP), the site is within the Central Business District, which reiterates a maximum residential floor space ratio of 3:1.

See additional analysis, detail, and diagrams in 01 Project Rationale in the Large Project Supplementary Information Booklet.

See also Section 07 of the **Large Project Supplementary Information Booklet**, as well as the **Structural Impact of the Tower Height** memo from RJC Engineers.

Height

At 20 storeys — four storeys for the existing heritage building and 16 storeys for the addition — the proposed rooftop Height is 64.18 m. This exceeds the 43.0 m set out by the CBD-1 zoning by 21.18 m. The Height is consistent with OCP height limit of up to 24 storeys. The DCAP outlines a maximum building height of 45.0 m or approximately 15 residential storeys for the site (Map 32). The primary reason for the proposed height is the opportunity to retain the existing heritage building and have a sensitive and well-considered architectural response in the design of the addition.

There are several additional contextual factors which support this variance to the maximum Height:

- The slender tower profile preserves more sky view, enhances access to daylight, reduces shadowing, and minimizes impacts on the existing heritage structure.
- The cross slope of the site—two storeys north to south—results in 18 perceived storeys at the main entrance at Blanshard Street and Burdett Avenue, and 20 storeys along Fairfield Road, which is directly opposite two existing high-density residential projects.
- The existing generous floor-to-floor heights in the heritage building are retained.
- A taller tower-shaped addition has less seismic impact on the existing heritage building.
- The height is generally consistent with the urban amphitheater concept described in the DCAP

Setbacks

The siting and design of the BC Power Commission Building defines the minimum setback of any addition which confines itself to the footprint of the existing building. As a result, the proposed addition has minimum setbacks which are the same or greater than the existing building.

See Architectural drawings **A015, A200–A203** for additional detail on the extent of this proposed variance.

Due to the Height and the location of the existing building, the addition projects beyond the 1:5 DCAP inclined plane envelope along the south elevation above approximately 36.2 m.

Floor Plate Limitations and Building Separation

The small floor plate residential tower addition (424 m²) conforms to the floor plate maximum size for buildings taller than 30 m. Because the footprint of the proposed tower addition fits entirely within the footprint of the existing heritage building, the residential exterior wall clearance to the property line along Fairfield Road does not conform with the 6.0 m clearance called for in the DCAP Appendix 6. There is a 3.25 m minimum clearance to the corner of the tower addition above Fairfield Road. The distance from the addition to the nearest tall neighbour, 751 Fairfield Road, is greater than 18 m.

Shadow Impact + Wind Study

Sun shadow studies demonstrate that the proposal preserves solar access on sidewalks opposite the development during key mid-day hours and has a modest added impact on the adjacent streets and public realm overall. A wind study has also been completed for the proposed design.

See also Architectural drawing **A014** for shadow analysis.

See also **Pedestrian Wind Comfort Assessment** by RWDI.

Project Benefits and Amenities

The development proposal aspires to benefit the economic, social, and cultural life of Victoria. Several aspects will be of benefit to the broader community:

- Additional employment and tourist infrastructure supported by the hotel,
- The rehabilitation of and added semi-public access to a significant historic building,
- Added downtown housing to support more lively and walkable communities, and
- An updated urban park and potential new public transit hub.

The completed development will feature a number of amenities for the residents, hotel guests, and the public, including:

- Accessible sidewalks and green spaces all around the site,
- New project-sponsored dedicated car share spaces,
- Potential new public transit shelter and seating,
- A shared eBike fleet for the building,
- Electrified short- and long-term personal mobility charging,
- A new multimodal entry plaza,
- Opportunities for public art, and
- Publicly accessible historic conference room and new rooftop outdoor space, operated under the hotel use.

Need and Demand

The downtown area of Victoria is a key centre in the region's employment and population growth projections and planning. The recently released 2021 national census data show that the population of downtown Victoria grew by 40.8% between 2016 and 2021. This represents 25% of the total population growth in Victoria since 2016.

The anticipated growth in the downtown core forms part of the foundation of the Downtown Core Area Plan. The Victoria Housing Strategy (Phase 2) and the CRD Regional Growth Strategy identify housing as a core need for the region, especially in urban centres. The DCAP also refers to City forecasts which indicate that, by 2026, the total combined floor space demand for residential, office, retail, service, and hotel room uses in the Downtown Core Area will increase by an additional 853,800 m² to 1,174,300 m².

The 2021 report *Victoria's Housing Future* notes that current housing growth capacity in Victoria is falling short of future needs. This, in turn, affects the City's ability to meet housing affordability targets. The analysis of new housing units by target growth area set out in the OCP shows a potential shortfall in the Urban Core but a positive indication from recent trends.

Supported by operator interest and overall demand and room occupancy forecasted to climb back to—and then exceed—pre-pandemic levels by 2024, there is a need in Victoria for more hotel rooms. The micro-hotel is anticipated to be run by a boutique lifestyle operator offering an efficient operating model, targeting travel-sized and flexible guest room configurations with an urban vibe in a prime location.

Neighbourhood

Victoria's Housing Future discusses the “15-minute neighbourhood” as a key concept in city planning, and underscores the social and economic value of building communities where there are a diversity of shops, schools, offices, and other key destinations within a 15-minute walk from home.

In addition to the existing nearby high-density housing, employment base, and network of schools and services, there is significant new development near the site, including the recently approved Telus Ocean project (749 Douglas Street, 2-minute walk) and the proposed Capital VI office building (1221 Blanshard Street, 5-minute walk).

Safety and Security

Crime Prevention Through Environmental Design (CPTED) principles have been considered in the building planning, landscape design, and public realm improvements. The project aspires to be an active, inviting, safe, and inclusive precinct that will bring Victorians and visitors to the site in a way that strengthens urban networks and promotes neighbourhood vitality.

See also **Parking & TDM Study and Traffic Impact Assessment** by WATT Consulting Group.

See also vehicle and bicycle parking details on **A011**, **A100** and **A101**.

Transportation

The lot configuration and siting of the existing heritage building do not permit any significant off-street vehicle parking. Considerable effort has been undertaken in concert with WATT Consulting Group to develop a suite of mobility options and Transportation Demand Management measures to reduce vehicle parking demand and encourage the use of public transit and alternative active transportation modes. See more information in WATT’s Transportation Demand Management Study included in the submission materials. In addition, the immediate adjacency of the BC Transit bus terminus along Fairfield Road, the potential redesign of Penwill Green and the upgraded street frontages all around the building offer an opportunity to make broader neighbourhood-level transportation improvements. This has culminated with a vision for the development to potentially become an “urban mobility hub.”

Vehicle + Bicycle Parking

Two on-site parking stalls and 25 off-site stalls are proposed. The table below notes the current vehicle parking, the proposed, the Schedule C parking requirement for the proposed land uses, and the difference between the proposed and Zoning requirements.

Existing On-Site Vehicle Parking	Required Vehicle Parking per Zoning Bylaw 2018	Proposed Vehicle Parking	Reduction through Demand Management	Shortfall
6 stalls	106 stalls	27 stalls	-51 stalls	28 stalls
	(24 hotel, 82 residential)	(25 off-site)		

Long-term bicycle parking 30% above the minimum requirements is proposed and the required short-term bicycle parking (some electrified) is provided for building guests, residents, and visitors. Long-term bike parking will be electrified for charging. A fleet of 11 shared eBikes for resident and hotel guest-use is proposed. End-of-trip facilities for hotel staff are included. Residents will have access to a bike repair station and 11 large parking spaces for cargo bikes and similar non-standard bicycles. Bicycle parking and a public bicycle repair station are part of the potential redesign of Penwill Green park.

Loading

Loading will be managed on-site at the southeast corner of the site at the existing service entrance off of Fairfield Road.

Parcel delivery vehicles and passenger pick-up and drop-off can be managed on-site at the front plaza at the corner of Blanshard Street and Burdett Avenue.

Transportation Demand Management

In addition to the bicycle measures listed above, a variety of other transportation demand management measures are proposed to reduce the overall demand for parking and to encourage alternate modes of transportation. These include:

- Two project-sponsored, publicly accessible car share spaces located on Burdett Avenue,
- Transit pass programs for hotel employees and tower residents,
- Ample short-term pick-up and drop-off space to facilitate deliveries, ride hailing, and other short-term uses, and
- Multi-modal wayfinding to promote active transit and public transit use.

Public Transit Infrastructure Improvements

The site is adjacent to the existing Fairfield at Blanshard transit terminus point for the Victoria Regional Transit System. In addition to overall pedestrian and bicycle connection improvements to this transit node from the building and surrounding area, the site's development offers several potential transit infrastructure improvement opportunities that would be of benefit to not only the neighbourhood but the City and region. Pending CAC agreement and further discussions with BC Transit, the suggested infrastructure improvements for the site include:

- *Potential expanded transit vehicle capacity:* The extension of the layby curb on the north side of Fairfield Road west towards Burdett Avenue. Expanded capacity could also potentially support the introduction of RapidBus, since two of the transit system's proposed RapidBus routes (the West Shore RapidBus Line and Peninsula RapidBus Line) will require a terminus point in the downtown area.
- *Space provision for transit vehicle electric charging infrastructure:* Which could help with the transit system's evolution to zero emission vehicles and also reduce noise of transit vehicles in the area.
- *Space provision for expanded transit passenger amenities:* Including transit shelter, expanded waiting space and bus loading facilities on Fairfield Road integrated as part of the Penwill Green improvements.

The extent of the public transit improvements will be confirmed based on further discussions with City staff and BC Transit.

Green Building Features

The design team has a shared commitment to environmental responsibility and includes LEED-accredited professionals and Certified Passive House Designers. In addition to meeting or exceeding the requirements of the BC Energy Step Code, the team will consider the global warming potential of building materials, up- and down-stream waste potential of materials, and the durability and suitability of materials, systems, and equipment.

As an example of adaptive re-use, the project proposes an array of environmentally responsible features:

- Minimum BC Energy Step Code performance at Step 2 for the residential tower and commercial hotel.
- Re-use of most of the existing concrete structure of the BC Power Commission building, resulting in significantly reduced construction material use, less energy and waste expended in demolition and disposal, preservation of embodied carbon, and the extension of life for a 70+ year old structure.
- An all-electric heat pump-based heating and cooling system capable of being shared between both the hotel and residential tower resulting in a more sustainable, efficient system.
- Landscaped roofs and site planting designed for on-site storm water management.
- An architectural design which considers passive design principles, limiting window-to-wall ratios.
- Extensive bicycle storage facilities, including electrified long-term bicycle parking spaces and spaces for cargo bicycles.
- End-of-trip facilities for hotel staff, including showers, lockers, and secure, electrified bicycle storage.
- Building-sponsored public car share spaces and resident car share memberships to reduce parking and personal vehicle demand. And,
- Low-use water fixtures and high efficiency LED lighting throughout.

See also drawings **C02, C03,**
and **Sewage Attenuation**
Review from WSP.

Infrastructure

In addition to the streetscape, public transit, and park renewal works described above, the team has conducted a preliminary site servicing study for the proposed intensified use on the site. A sewage attenuation technical memorandum and Civil servicing plan by WSP are included in the submission materials.

Community Engagement

The project team have consulted with City staff several times over the development of this project. The team met the Downtown Residents Association in December 2021 and provided the pre-application package to the City for online viewing and comment.

The team hosted a hybrid in-person and online Community Meeting on March 21, 2022. The in-person component was held at the Parkside Hotel and was attended by more than forty people. The team also held a public “open house” at the 780 Blanshard Street heritage building on June 1, 2022.

Archaeological Site Clearance

A review of the site undertaken by Stantec determined that there are no archaeological concerns. There are no registered archaeological sites on the property or any nearby properties, and modeling suggests low archaeological potential for the presence of unregistered sites on the property. This determination is being summarized in a formal letter that can be provided during the application review process.

Site Disclosure Statement

A Phase I Environmental Site Assessment was completed by PGL Environmental Consultants.

Conclusion

The overall aim for this rezoning and heritage alteration permit proposal is to enhance the building, the site, the neighbourhood, and the downtown. The team hopes that this project will contribute to Victoria’s growth and evolution by way of meaningful engagement with all stakeholders in the shared project of city making. We look forward to further connecting with residents and working with staff and Council through the approvals process.

The **Large Project Supplementary Information Booklet** included with the submission contains a variety of detail and analysis on the proposal, including additional contextual information, site and historical analysis, shadowing and view impact studies, details on proposed materials, and responses to City feedback received to date.

Please do not hesitate to contact the team for any additional information or clarifications.

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Steve McFarlane Architect AIBC FRAIC LEED® AP
principal

See also Section 01 Project
Rationale - Community
Engagement Summary
in the **Large Project**
Supplementary Information
Booklet.

See also **Phase 1**
Environmental Site
Assessment from PGL
Environmental Consultants.