



July 7, 2023

City of Victoria
No.1 Centennial Square
Victoria BC V8W 1P6

Attn.: Mayor & Council

**Re: 1905-1907 Fort Street and 1923-1929 Davie Street
Rezoning and Development Permit Application**

PROJECT OVERVIEW

Three Shores Management is proposing to build a 79 unit mixed use strata building at 905 – 907 Fort Street and 1923 – 1929 Davie Street. Access to jobs, natural and recreational amenities, and transit will attract residents to this development. These residents are anticipated to include young working adults, first time home buyers, and young families. This development aims to establish a mix of housing types and affordability to meet the expected housing needs and to contribute towards achieving overall housing objectives for the City as a whole.

The housing continuum highlights the range of housing types that should be available in a community from emergency shelters on one end, all the way to homeownership on the other. In between lies an assortment of housing options and types, each critically important for different people at different times in their lives. A healthy city needs to have plenty of options available at all points on the spectrum to ensure every citizen's needs are being met, because, naturally, our housing needs change as we move through different stages and circumstances in our lives.

Our proposal responds to the Victoria's Housing Needs Assessment, which includes actions that seek to meet the diverse needs of the city's current and future residents across the housing continuum. The findings of the Housing Needs Report highlight a number of key needs in the City:

1. Attainable Housing - There is a pressing need to develop a range of housing options at varying levels of affordability for both renters and owners to address the growing gap between median incomes and housing costs.
3. Housing for Seniors - Housing that allows seniors to age in place is a current priority and will continue to become more pressing. Housing that incorporates adaptable and accessible design and provides opportunities for seniors to remain in the community.

4. Housing for Families - The small size of many units in the City highlights the importance of more family-sized units in multi-family forms of housing for both rentals and ownership. There is also a need for greater supports for lone-parent households.

Transit-Oriented Infill Development

With the growing body of research indicating that densification holds the key for cities fight against climate change, reducing our dependence on cars is the most significant component of reducing greenhouse gas emissions. The central location of this site encourages a car-lite lifestyle, offering alternative transportation modes like walking, cycling and transit as primary options for future residents.

While households choose where to live for a variety of reasons, the housing affordability and transit connection is an important consideration. Analysis of affordable housing solutions points to transit-oriented development as one of the top approaches for making housing more affordable.

Transportation costs add to a household's housing cost and can determine the affordability of a home. For many working families, transit is a necessity to get to work and it has been shown that living near frequent transit can make it more affordable by having relatively low transportation costs.

The site is located within close proximity to transit routes and bus stops on Fort Street as well as on the frequent transit network identified in the Official Community Plan. The site is within walking distance of the commercial areas and employment centres of North and South Jubilee. This will significantly reduce yearly costs for future residents who choose to forgo car ownership and utilize active, public, and shared transportation.

Unit Mix and Accessible Design

One of the stated goals of the Housing Needs Assessment is to encourage new residential development to provide a mix of unit sizes (studios, 1 bedroom, 2 bedroom and 3 bedroom units) throughout the building to accommodate different household needs and sizes. The unit mix and size of this development provide a wide variety that will appeal to several different renter and purchaser profiles.

In addition to the variety in unit mix and size, this development will provide adaptable design measures, per established City guidelines, to accommodate the needs of people with disabilities and/or to serve the needs of elderly residents. All of the units have been designed as basic accessible units and at least 20% of the units will be designed as Adaptable Design Level 2.

OFFICIAL COMMUNITY PLAN OBJECTIVES

The City of Victoria's Official Community Plan sets out broad objectives and policies that will help guide Victoria's housing and sustainability commitments and work toward the achievement of long-term sustainability goals. The goals included in the OCP are adapted to focus on the areas that are most relevant to the community. These goals will must align to secure the growth and development in Victoria.

Our proposal meets or exceeds a number of the objectives outline in the City of Victoria's Official Community Plan while at the same time trying to address the many of the housing supply issues that we currently face. Here are a number of the objectives being met with our proposal:

LAND MANAGEMENT AND DEVELOPMENT

Broad Objectives

6 (a) That at least 20,000 new residents and associated housing growth is shared across the city in the following approximate proportions: 50% in the Urban Core; 40% in or within close walking distance of Town Centres and Large Urban Villages; and 10% in Small Urban Villages and the remainder of residential areas.

6 (b) That new employment growth is focused in the Urban Core, Town Centres, employment districts, and along corridors served by rapid and frequent transit with new office development concentrated downtown.

6 (c) That the Downtown Core Area remains the Capital Region's primary economic, social, arts, cultural, and entertainment centre and where government employment and supporting services are retained and expanded.

6 (d) That Town Centres, Large Urban Villages and employment and Industrial districts develop to densities capable of supporting economically viable renewable district energy systems, community and commercial services and civic amenities appropriate to their different scales and roles in the city

6 (f) That Town Centres and Urban Villages become progressively more complete so that over time all residents can reach goods and services to meet daily needs within a 15 minute walk of home.

6 (g) That all 13 city neighbourhoods contain a range of housing types suitable to people with a mix of incomes, living in a variety of household types, throughout their lives.

Place-Base Land Use Management

6.1.5.A - Mixed Residential consists of multi-unit residential in both ground-oriented and low-rise apartment forms, serving as a transition between Traditional Residential and Urban Residential areas. Mixed Residential areas are envisioned to be diverse in housing type and tenure. Incentives and flexibility in height and density may be considered to encourage tenures beyond market strata. Limited local serving commercial may be considered where the use provides community benefit and contributes to the overall objectives of this plan. All forms should adhere to good urban design principles, consistent with the City's design guidance, and should be responsive to the existing and envisioned context of the surrounding area.

6.1 - Urban place designations are established and identified on Map 2, including built form, place character, land use and density characteristics, to represent present and proposed conditions and to support the development of a diversity of places across the city defined generally as follows:

6.1.6 - Urban Residential consists primarily of multi-unit residential in a wide range of detached and attached building forms, including townhouses and row-houses, low and mid-rise apartments, with a residential character public realm featuring landscaping and street tree planting, and mixed-uses located along arterial and secondary arterial roads. Urban Residential areas are generally located within 400 metres of the Urban Core, a Large Urban Village, Town Centre, or frequent transit route, or within 800 metres of a rapid transit station.

6.1.8 - Large Urban Village consists of low to mid-rise mixed-use buildings that accommodate ground-level commercial, offices, community services, visitor accommodation, and multi-unit residential apartments, with a public realm characterized by wide sidewalks, regularly spaced street tree planting and buildings set close to the street frontage, anchored by a full-service grocery store or equivalent combination of food retail uses, serving either as a local, rapid or frequent transit service hub

General Development Guidance

6.5(b) - Site specific development can depart from the norm if the development goes through a rezoning, is supported by the local area plan, is consistent with City policies, good urban design principles, and the objectives of this plan, and is responsive to the envisioned context of the surrounding area.

6.7 - Give consideration to minimum development densities necessary to support renewable technology and district energy systems in development decisions respecting major projects and in local area planning for the Urban Core, Town Centres, Large Urban Villages, and industrial and employment designations.

6.8 - Encourage the logical assembly of development sites that enable the best realization of permitted development potential for the area.

6.9 - Give consideration to site-specific amendments to this plan that are consistent with the intent of the Urban Place Designations and that further the broad objectives and policies of the plan, as appropriate to the site context.

Town Centres and Urban Villages

6.20 - Consider objective 6 (f) and the guidelines in Figure 9 in any proposals to establish new Town Centres and Urban Villages through local area plans or amendments to this plan, giving further consideration to locations which have, or will have, sufficient residential densities to support the range of services and amenities appropriate to an Urban Village or Town Centre.

6.22 - Generally support new development in areas designated Urban Residential that seeks densities toward the upper end of the range where the proposal significantly advances the objectives in this plan (OCP) and is:

6.22.1 - within 200m of the Urban Core; or

6.22.2 - within 200m of Town Centres or Large Urban Villages; or

6.22.3 - along arterial or secondary arterial roads.

The proposal meets the Urban Place Guidelines by having primary doorways facing the street, the provision of front yard landscaping, boulevard and street tree planting, as well as driveway access to underground parking.

Employment Lands

6.23 - Give consideration to future employment intensification opportunities at Royal Jubilee Hospital and Gorge Road Hospital through the preparation of site-specific master plans undertaken in partnership with the Health Authority

Transit Corridor Planning

6.29 - Through the preparation of local area plans, establish detailed policies, regulations, and guidelines for the design and development of the frequent transit corridor-oriented Stadacona Village and Jubilee Village, where the scope of the planning study considers the lands generally 400 metres north and south of the proposed priority transit alignment along Fort Street from Cook Street to the municipal boundary at Foul Bay Road.

Measuring Progress

6.32.5 - A minimum 90% of all dwelling units are within 400 metres either of the Urban Core, a Town Centre or an Urban Village by 2041.

TRANSPORTATION AND MOBILITY

Broad Objectives

7 (c) - That complete greenway and cycling networks that include separated bicycle lanes and generous pedestrian sidewalks and footpaths connect the Urban Core, Town Centres and Urban Villages with major parks, civic institutions, employment areas, recreational and cultural attractions, and other common destinations.

Urban Thoroughfare Management

7.8 - Coordinate public and private sector improvements to streets, pedestrian and cycling networks and facilities through improvements to facilities consistent with established City standards. Seek the acquisition of right-of-ways or easements consistent with established City standards through the rezoning and development permit process, where acquisition will further plan objectives

Parking Management

7.12 - Review and update the Zoning Bylaw to consider reductions in parking requirements where:

7.12.1 - Geographic location, residential and employment density, housing type, land use mix, transit accessibility, walkability, and other factors support non-auto mode choice or lower parking demand; and,

7.12.2 - Activities and circumstances of land uses, structures or buildings include the provision of a comprehensive suite of permanent on-site alternative travel supports and active transportation infrastructure, including such things as short-term and long-term bicycle parking facilities including shower and locker facilities, ridesharing, car-share co-ops, payroll transit passes and other automobile trip reduction measures

Public Transit

7.14.1 - Encouraging residential and employment growth to concentrate in the Urban Core, Large Urban Villages, Town Centres and Employment areas along rapid and frequent transit corridors.

PLACEMAKING – URBAN DESIGN AND HERITAGE

Broad Objectives

8(d) - That social vibrancy is strengthened through human scale design of buildings, streetscapes, and public spaces

(8g) - That a sense of place is developed and enhanced through urban design features

Centres, Villages and Nodes

8.30 - Accommodate urban growth in Large and Small Urban Villages through design that maintains human-scale in buildings, structures, and public spaces, such as streetscape and squares

8.31 - Animate the pedestrian realm in the Urban Core, Town Centres, Urban Villages and employment districts through urban design consideration, such as local gateways, sidewalk cafes, landscaping, street furniture and art in public places as generally consistent with the Urban Place Designations

8.32 - Require new development to build at-grade building frontages that are suitable for active uses on commercial streets, where viable, in the Urban Core, Town Centres, Urban Villages, and General Employment areas.

Building and Sites

8.43 - Encourage high quality architecture, landscape and urban design to enhance the visual identity and appearance of the City

8.45 - Encourage human scale in all building design, including low, midrise and tall buildings, through consideration of form, proportion, pattern, detailing and texture, particularly at street level.

Natural Features and Landscaping

8.60 - Strengthen greenway identity through integration of natural features and landscaping, where feasible, to encourage use and enhance the experience of cyclists and pedestrians.

COMMUNITY CONSULTATION

Throughout the engagement process we heard feedback from the South Jubilee residents. Below is a summary of some of the feedback that we received from various stakeholders and the City Staff. We have attempted to respond to as much as the feedback as possible while maintaining the viability of the project.

Building Height and Density

Some neighbours expressed concern over the proposed height and density of the project while some agreed that the Official Community Plan (OCP) contemplates up to 6-storeys along Front Street. There was general support for the building to step down Davie Street towards the single family houses.

The neighbourhood recognizes that this is an area in transition and next to a major employment centre in the Royal Jubilee Hospital. When considering height and density it is also important to widen our view to the broader context of the neighbourhood. Rezoning this site to Urban Village would not only better align with the neighbouring properties along Fort Street, but it would also counterbalance the large institutional buildings across the street.

Housing statistics, trends and latent demand tells us that we have a lot of catching up to do. The City of Victoria's Housing Needs Assessment projects a total of 2,900 homes will be needed in the City by 2025 to respond to the growing population in our region. Our proposal includes 79 homes, with 30% being family-friendly housing.

Building Design and Setbacks

Some stakeholders commented on the building design and the need for it to fit in with the neighbourhood. The building façade has been revised to reflect a more West Coast contemporary architecture. The exterior palette extends the refined architectural expression, using high-quality finishes, including cementitious finishes, metal cladding, clear glass, and full height glazing on the ground floor commercial unit facing the street. The use of planar and mass elements, accented natural materials, and transparency to connect indoor to outdoor spaces help ground this building in the West Coast style.

Our conceptual approach focuses on integrated passive design strategies to reduce energy and resource consumption, as well as inform the architecture. The architectural vocabulary of generous roof overhangs and wall projections are key elements in the sustainable design strategy, helping to control solar gain into the primary windows of most residential units. The building has been designed to meet Step Code 3.

We have also paid careful attention to the building orientation, window openings and external shading. The setback to the east has been significantly increased to provide increase privacy to our neighbour as well as reducing the building mass along Fort Street.

Traffic and Access

Some stakeholders expressed interest in understanding how the proposed building will affect the local area traffic levels and parking supply. There was some concern over the number of parking stalls being proposed and that it would have a negative impact on the on street parking in the surrounding neighbourhood. Additionally, some stakeholders asked how the proposed building will be accessed by vehicles, cyclists and pedestrians, as well as how Davie Street will function for parking access, waste and recycling pickup and loading.

Our proposal is located at the intersection of numerous transportation modes, with excellent access to transit and cycling infrastructure. Complete communities offer a mix of housing options, a good range of jobs, and easy access to stores and services, schools, childcare and parks. The closeness of these everyday things provides residents with more choices about how to move about their neighbourhood and encourages less driving and more walking.

There is also a new trend in parking requirements that is happening in Canada. The Open Option Parking basically removes the minimum parking required in a residential building. The amount of parking provided is left to the owner/developer based on demand and market conditions.

The City of Edmonton instituted no minimum parking requirements in 2020 and the City of Vancouver is planning on implementing no minimum parking requirements as part of their climate action plan.

In support of the proposed rezoning, we have retained IBI to complete a transportation report with and potential Transportation Demand Management (TDM) strategies for lowering traffic and parking demands.

With regards to waste and recycling pickup and loading, a garbage and staging plan will be completed as part of the Building Permit process.

Landscaping and Tree Loss

We heard concerns around tree loss as a result of the proposed development and questions about how our landscape plan will provide both private and public benefit. The landscape design proposed seeks to design a public streetscape that enhances the pedestrian experience while providing an enjoyable green space in the private residential spaces. To provide as much tree canopy as possible, we have reduced the size of the parkade footprint to provide large tree root zones.

We have created a strong, progressive development concept that will be both pleasing and beneficial to the people of the Victoria. It satisfies the City's stated community and design objectives, it responds to the market needs of Victoria and it reflects very contemporary green goals for sustainable growth.

If you have any questions or require further clarification of any part of this application, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read "B Savage".

Barry Savage
Principal and Co-Founder

Cc: South Jubilee Neighbourhood Association