

February 7<sup>th</sup>, 2020

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

**Attn: Leanne Taylor**

**Re: 43-55 Gorge Road and 2827-2831 Irma Street – Application Review Summary Letter Response**

Dear Leanne Taylor,

Please find enclosed our response to the letter from the City of Victoria received digitally on December 4<sup>th</sup>, 2019 regarding the application for 43, 45 and 55 Gorge Road East and 2827, 2829 and 2831 Irma Street (the “Site”) located within the Burnside Gorge Neighbourhood Plan (the “BGNP”) area.

A request for bubbled drawings was been made, but several substantial changes were made in response to the requested comments:

- The parkade entry has been moved south which had a ripple effect throughout the building from the parkade to the units above
- The retail now extends the entire frontage of Gorge Road
- The lobby entrance is now on Irma Street
- The southern elevation has been setback and has a reduced massing
- The materials have been redesigned in response to the request to create a more urban residential feel and engage with the streetscape environment

As a result of these large moves, the entire building was redesigned and the task of providing bubbled drawings is more simply addressed by reviewing the updated drawing set.

Included with our letter are the following documents:

- Architectural (WA Architecture Ltd)
  - 3 sets 8½” x 11”
  - 2 sets 11” x 17”
  - 5 sets full size
- Landscape (LADR Landscape Architects Inc)
  - 3 sets 8½” x 11”
  - 2 sets 11” x 17”
  - 5 sets full size
- Arborist (Dunster & Associates Environmental Consultants Ltd)
  - 1 updated Arborist Report
- Surveyor (McElhanney)
  - 1 updated Survey



Please find our response as follows to the requirements listed under the headings “Conditions to be met prior to Committee of the Whole”:

**Development Services Division Comments:**

Conditions to be met prior to the Committee of the Whole:

- ***Two buildings on the site would be more appropriate in order to achieve a site plan that complies with the design guidelines. Reconsider the site planning and break up the amount of building mass, especially along the south and west elevations, and provide a sensitive transition to the lower density residential uses to the south.***
- PC Urban has considered the request for two buildings, but since the three properties along Irma Street were purchased by PC Urban (with guidance from Planning staff) the one building project has been paramount to making a neighbourhood rental project at this location economically feasible.

Keeping the building as 1, PC Urban has taken a number of steps to address the elevation and treatment of the southern neighbours' condition:

- Significant planting has been proposed along the entire southern property line (8 new trees are being proposed)
- The rooftop patio has been stepped back and programmed such as to have the uses away from the current building on the southern edge of the property.
- A section of massing along this elevation has been removed to create greater separation from the neighbour
- The building setback has been increased to over 6m at the shortest distance point, leading to a total separation between the proposed building and the existing building of 10.13 metres
- The western corner unit has been re-oriented towards Irma Street
- The patios have been enclosed within the envelope to reduce overlook concerns

The revisions made significantly reduce the impact of the proposed development from the previous design, help make the southern elevation more liveable and serve to present an engaging frontage towards the neighbour.

The building has been redesigned along Irma to ease the transition from commercial to the residential neighbour's to the south through the massing vocabulary. The balconies have generally been recessed or have the appearance of being recessed per the request from Planning.

- ***Provide a sensitive transition in scale to the adjacent traditional residential neighbourhood through considerations for massing and other design features. Please increase the side yard setbacks and provide a shadow study.***
- PC Urban has increased the setback to the traditional residential neighbourhood along the southern property line to 6.1m. As discussed above, the massing along the southern property line has been redesigned with greater setbacks in the center to help alleviate overlook into the neighbouring property as well as breaking down the mass of the southern elevation as viewed from Irma Street.

A shadow study has also been provided which demonstrates there is minimal to no impact to the neighbouring properties.

- **Consider a building design that depicts a mœ“urban residential feel.”**
  - PC Urban and WA Architecture feel strongly that the building re-design creates a strong urban residential feel that creates an architectural rhythm with the adjacent project (“Dahli Place”) in terms of massing and architectural style.

Furthermore, along Irma Street a ground-oriented design that encourages street vitality and social interaction amongst neighbours has been added by creating private entrances and patios for the ground floor units. This has been further enhanced by adding a vertical brick element that visually breaks-up the building while also creating a rhythm that mimics townhouses and helps ease the transition to the single-family dwellings to the south.
- **The interior elevations facing the courtyard require more design attention. These elevations will be highly visible from adjacent properties.**
  - The interior courtyard elevations have been given the same level of thought & design intent as the street facing elevations. The focused view into the courtyard from Gorge Road & the adjacent hospital property has been considered when redesigning the elevations, to complement & contrast the street facing elevations. Please see the Architectural drawings for more information.
- **Please relocate driveway to the south side of the site to minimize disruption to the streetscape appearance and relocate the garbage and recycling underground. Confirm how the commercial tenants will access the garbage and recycling room.**
  - The driveway has been relocated further south to minimize disruption to the streetscape. Additionally, the location maintains an efficiency for the ramp slope and parking but still retains a separation from the neighbour’s driveway to avoid access conflicts.

In their current location the garbage and recycling rooms offer the most efficient access for collection with minimal disruption to the neighborhood, as well as avoiding traffic disruption from these pick-ups. One of the concerns PC Urban heard during the public information meeting was garbage and recycling bins potentially being left on the street after pick-up; the proposed location will avoid this scenario.

Commercial tenants will be able to access this room through a key FOB from the outside.
- **The first storey of a mixed-used building should be designed with a minimum floor-to-ceiling height of at least 4m and a minimum depth of approximately 10m to accommodate a range of commercial uses. Please provide the dimensions of the commercial units on the floor plans and cross-sections.**
  - The depth of the units has been increased to 9.5m and the ceiling height has been increased to 3.5m, which is as much as feasible due to the site constraints. Please see the Architectural drawings for more information.
- **Increase the size of the corner retail unit to take advantage of the plaza at the corner.**
  - This corner retail has been combined with the other commercial along Gorge Road, providing a consistent commercial retail presence as well as an efficiency in design and access to/from parking. Please see the Architectural drawings for more information.
- **Enhance the corner of the building to ensure it is a prominent feature**
  - The Gorge Road building face has been redesigned with a stronger commercial vocabulary, including the use of colour to highlight the corner. The Main residential entry has been relocated around the corner onto Irma Street to transition between the Gorge commercial & Irma residential treatments at grade. Please see the Architectural drawings for more information.
- **Residential uses at street level must have strong entry features and building design that encourage interactions with the street. Please provide a stronger ground floor connection**

**to the street along Irma Street. Residential units must have direct access to the street.**

- The building design along Irma has been re-designed to orient positively towards the street with patios and private entrances. Additionally, the massing and materiality has changed to create a strong urban townhouse streetscape. Please see the Architectural and Landscape drawings for more information.
- **Please simplify the materiality and provide high quality and durable materials. Provide a consistent guardrail system on the building.**
  - The materiality has been simplified to create three architectural expressions along the Gorge and Irma frontages - a modern black and white massing above a continuous retail frontage along Gorge, a brick façade mimicking townhouses with recessed upper floors along Irma, and a corner expression at the south end of Irma Street. We believe these materials are high-quality and durable and a more consistent guardrail system has also been provided. Please see the Architectural drawings for more information.
- **Consider recessing the balconies or give the appearance of recessed building with architectural features.**
  - The majority of balconies have been recessed and have been incorporated into the design to achieve both a balance of outdoor space and urban design. Please see the Architectural drawings for more information.
- **Please confirm the depths of the canopies at street level.**
  - The balconies are 6' at the retail frontage. Please see the Architectural drawings for more information.
- **Label materials on the elevation plans, including soffits, canopies, undersides of building and retaining walls visible from the street.**
  - This condition has been met. Please see the Architectural drawings for more information.
- **Remove tree layer from the floor plans.**
  - This condition has been met. Please see the Architectural drawings for more information.
- **Please show unit layout for the larger two- and three-bedroom units.**
  - This condition has been met. Please see the Architectural drawings for more information.
- **Provide a landscape plan for the landscaping a grade and a separate one for the rooftop amenity space. The proposed landscape plan includes the fifth storey floor plan and therefore it is difficult to evaluate how the proposed landscaping at grade compliments the ground floor of the building. Please provide fence and gate details on the landscape plan.**
  - This condition has been met. Please see the Landscape drawings for more information.
- **The rear of multi-unit or mixed-use buildings adjacent to lower scale residential developments should provide landscaping and trees that mitigate the appearance of massing and contribute to a transition of scale. A greater building setback will allow for more privacy screening and tree planting. Provide information of proposed soil volumes for the trees.**
  - A greater setback has been provided, along with significant tree planting. Please see the Landscape drawings for more information.
- **Shift building back front Garry Oak tree #5. Confirm how to access this corner of the site for tree maintenance.**

- This tree and its relation to the building has been reviewed by a certified Arborist at Dunster & Associates Environmental Consultants Ltd and has been deemed to survive. Maintenance access to the tree can be provided from the retail plaza.
- ***Provide permeable surface treatment and label the hard surface materials on the landscape plan.***
  - This condition has been met where possible. Please see the Landscape drawings for more information.
- ***Please provide more information on the public art proposed for the plaza area.***
  - PC Urban provides public art on all projects, in a process which includes a public art consultant who engages local artists to create a unique and thoughtful art piece. At this time the public art process has not commenced.
- ***Please provide a lighting plan. Lighting should be human-scaled for night time visibility, comfort and security.***
  - A lighting plan will be provided prior to Committee of the Whole.
- ***Identify the location of the PMT station of the site plan and landscape plan.***
  - The PMT has been located at the south-west corner of the site. Please see the Architectural and Landscape drawings for more information.
- ***Please provide renderings of the building that demonstrate how the proposal fits in with the neighbourhood context along Gorge Road and Irma Street.***
  - Please see the Architectural drawings for more information.
- ***Please consider providing affordable and/or rental housing in perpetuity secured by legal agreement with your proposal.***
  - The building will include 100% secured rental housing by legal agreement registered on title. PC Urban maintains a commitment to build more rental housing, not just in Victoria but in a variety of urban markets. However, in this location, it is imperative that the one building proposal be maintained in order to provide this long-term community benefit.
- ***The Tenant Assistance Policy is applicable to rezoning applications to redevelop or demolish any building that will result in loss of existing residential rental units. For any renovation or redevelopment that requires relocation of existing tenants, the property owner must develop a Tenant Assistance Plan.***
  - A Tenant Assistance Plan was provided in the previous submission and has been re-submitted with this submission.

#### **Engineering and Public Works Department Comments:**

#### **Land Development:**

#### **Conditions to be met prior to Committee of the Whole:**

- ***Thank you for showing the requested Statutory Rights of Way (SRWs) of 4.92 metres on the Gorge Road East frontage and 1.38 metres on the Irma Street frontage on the Proposed Site Plan drawing. On the next plan submission, please clearly delineate these SRWs consistently across all plans, including the Landscape Concept Plan. Note that these SRW documents are to be secured by legal agreement and registered on title prior to establishing a date for Public Hearing.***
  - This condition has been met. Please see the Architectural and Landscape drawings for more information.

- ***Please confirm and indicate all dimensions correctly on the Proposed Site Plan. It is unclear what scale is being used (the title block indicates 1:100 and under the site plan it indicates 1:200 but there are incorrect or unclear dimensions with both).***
  - The scale being used on the site plan is 1:150. Please see the Architectural drawings for more information.
- ***Please clearly delineate the new sidewalks along both frontages. As shown on the submission, the new sidewalks are to be situated along the internal SRW boundary. Please note that the alignment of sidewalk should be adjusted in those locations that have preserved existing trees in order to mitigate damage to the trees.***
  - This condition has been met. Please see the Architectural and Landscape drawings for more information.
- ***Encroachments of private infrastructure are not allowed in the SRW areas, so please ensure that none of the landscape planters encroach and revise plans on the next submission accordingly.***
  - This condition has been met. Please see the Landscape drawings for more information.
- ***Please revise the frontage of the development at the corner plaza at the intersection of Gorge Road East and Irma Street to conceptually indicate key elements shown on the attached illustrative sketch. The sketch shows very conceptually how these elements can be integrated as part of the proposed frontage improvements. Please include a 'feature corner' treatment at the intersection, specifying materials such as concrete unit pavers, furnishings such as benches and a waste receptacle, and pedestrian lighting and trees in grates, along with the proposed layout, on the next plan submission. Please contact Joaquin Karakas, Senior Urban Designer, at 250.361.0535 or [JKarakas@victoria.ca](mailto:JKarakas@victoria.ca) for further information.***
  - This condition has been met as much as possible. Please see the Landscape drawings for more information.

#### **Transportation Review:**

##### **Conditions to be met prior to Committee of the Whole:**

- ***Staff will make a recommendation to Council that Transportation Demand Management (TDM) programs are secured through a covenant registered on the title of the property. Third party agreements with transportation service providers are also required. The intent of the proposed TDM programs is to help mitigate the anticipated parking shortfall. The anticipated parking shortfall and requested variance is 53 stalls.***
  - PC Urban will not be securing the TDM measures on title.
- ***As per the City's Highway Access Bylaw No. 91-038, a driveway crossing with two-way capacity is required. Please revise all plans accordingly on the next submission and include the driveway crossing flares and adjustment of proposed tree locations.***
  - This condition has been met. Please see the Architectural drawings for more information.

#### **Underground Utilities Review:**

##### **Conditions to be met prior to Committee of the Whole:**

- ***A change in zoning may allow for changes in permitted use and density resulting in increased sewage flow rates. The City's sanitary sewer system may not, at present, be sufficient to accommodate the increased flow rates. If the anticipated peak flow***

**rate produced by the new development is greater than the estimated peak flow rate of sewage that would normally be generated by permitted development under the existing zoning regulation, then attenuation of flows will be required. Therefore, a report prepared by a qualified Engineer comparing pre- and post- development sewage flow rates must be submitted to the Engineering Department (attention: Deb Becelaere at [dbecelaere@victoria.ca](mailto:dbecelaere@victoria.ca)) by the next plan resubmission as the report must be reviewed by staff and the requirement for attenuation determined prior to Public Hearing. The report is to include measures that the applicant intends to take to attenuate the sewage if required. Please contact Jack Hu, Sewer and Stormwater Quality Technologist, at 250.361.0551 or at [JHu@victoria.ca](mailto:JHu@victoria.ca), if further information is required. If it is determined that sewage attenuation is required, the registration of a Section 219 covenant will be necessary to secure the commitment to attenuate sewage. Registration of the covenant is required prior to establishing a date for Public Hearing.**

- This condition will be met prior to Public Hearing.
- **Please provide a conceptual site servicing plan for the proposed underground sewer, storm drain and water connections, shown from the City main lines to the property line. When determining the service connection locations, please ensure that required offsets from the existing and proposed boulevard trees, lighting and third party utilities are met. The services must not disturb or adversely affect existing or proposed trees, so please consider any impacts to existing or proposed trees and tree roots and ensure plans are consistent with comments from Parks Division staff.**
  - This condition will be met prior to Committee of the Whole.

#### **Parks Division Comments:**

#### **Conditions to be met prior to the Committee of the Whole:**

#### **Arborist Report**

- ***It is strongly advised that the design team work with the Project Arborist to develop plans that allow for the long-term preservation of trees that are suitable candidates for retention, especially the following: Garry oaks #4 and #5; Douglas-firs #2, #6 and #8; and silver fir #3 . Note that the English ivy needs to be removed from the trunk of Garry oak #5 to confirm its health/structural integrity. If exploratory excavations are required, contact Laura Ralph for a Tree Permit.***
  - PC Urban is committed to ensuring the long-term preservation of the Garry Oaks #4 and #5. The remaining trees are not able to be retained with the current design.
- ***The plans dated November 8, 2019 show Garry oaks #4 and #5 as retained – this is not possible due to the proximity to the proposed building; therefore, revisions are required.***
  - Dunster & Associates Environmental Consultants Ltd has confirmed that the retention of these trees with their current proximity to the proposed building is possible. Please see the updated Arborist Report for more information.
- ***The applicant must engage an ISA Certified Arborist with a Tree Risk Assessment Qualification (TRAQ) to undertake a tree inventory/assessment and provide a written Arborist Report of a “Tree Preservation Plan” to assess potential impacts to all trees on the municipal frontage, trees on the subject lot, and offsite trees with critical root zones extending onto the subject lot (including the offsite elm near the southeast corner of the subject area with 74 cm DBH and the row of offsite columnar maples east of 2829 and 2831/2833 Irma). The report must follow the “Terms of Reference for a Tree Preservation Plan.” The Arborist must review the proposed building plans, all hardscape/landscape changes and all proposed or required underground or overhead utilities. The Tree***

**Preservation Plan shall make recommendations for tree protection fencing, arborist supervision, site access, material storage areas, any pruning that may be required to provide clearance, and any other mitigation necessary.**

- Dunster & Associates Environmental Consultants Ltd have updated their Arborist Report to address these requests.
- **All trees with DBH greater than or equal to 10 cm must be included in the Arborist Report/Tree Resource Spreadsheet (for multi-stem trees, stems less than 10 cm DBH do not have to be included in calculated DBH). All inventoried trees onsite should be tagged.**
  - This condition has been met. See the updated Arborist Report for more information.
- **Since this application was received after October 24, 2019, Tree Preservation Bylaw No. 05- 106 consolidated on November 22, 2019 applies. Consequently, the following trees are considered bylaw protected:**
  - **0.5 m in height and greater: Garry oak (*Quercus garryana*), Arbutus (*Arbutus menziesii*), Pacific dogwood (*Cornus nutallii*), and Pacific yew (*Taxus brevifolia*).**
  - **Greater than 30 cm trunk diameter at 1.4 m above grade: All other species.**
  - **A replacement tree planted as a condition of a tree permit.**
  - **A tree on a steep slope.**
  - **A tree that is retained voluntarily by the owner as part of an application for a permit that would affect the tree and is protected by a restrictive covenant in favour of the City.**
- **The Arborist Letter dated Oct 31, 2019 does not meet the City of Victoria Terms of Reference for a Tree Preservation Plan. Note that the locations of trees #6 and #7 are transposed in Figure 1 of the Letter.**
  - This condition has been met. See the updated Arborist Report for more information.

## Plans

- **All tree locations must be surveyed.**
  - This condition has been met. See the updated Arborist Report and updated Survey for more information.
- **The Landscape Plan must show all existing trees and identify as retain or remove. Please use an X to indicate proposed tree removals.**
  - This condition has been met. See the updated Arborist Report for more information.
- **The Tree Preservation Plan must show the Critical Root Zones of all trees, identify trees as retained or removed, and show tree protection fencing. Please use an X to indicate proposed tree removals.**
  - This condition has been met. See the updated Arborist Report for more information.
- **The Site Plan must show the Critical Root Zones of all trees to be retained.**
  - This condition has been met. See the updated Arborist Report for more information.
- **All plans must include tree ID numbers as per the Tree Resource Table/Arborist Report.**
  - This condition has been met. See the updated Arborist Report for more information.
- **For each bylaw-protected tree proposed for removal, two replacement trees are required. Please indicate the locations of proposed replacement trees on the Landscape Plan. Replacement trees are not to be located on top of underground parking, should be at least 3m away from buildings, 2m from property lines, and species selection is subject to approval by Parks.**



- This condition has been met. See the updated Landscape drawings for more information.
- ***Please provide proposed servicing information for sanitary sewer, storm drain, and water. Third party utilities such as gas, BC Hydro, and telecommunications should also be included.***
- Noted.
- ***To align with the City of Victoria's Urban Forest Master Plan and promote feasible tree planting on the site, the applicant should increase setbacks from proposed above and below-ground infrastructure. Minimum soil volumes required for ultimate tree size should be respected.***
- LADR Landscape Architects Inc have reviewed the proposed trees and determined their soil volumes are adequate. See the updated Landscape drawings for more information.

**Permits and Inspections Division Comments:**

**Conditions to be met prior to the Committee of the Whole:**

- ***Ensure the FD connection on the front of the building would not be positioned so that the hoses would be a tripping hazard in front of the exits of the building.***
- This condition will be met.
- ***The Fire Department connection shall meet the requirements for location/distance from the building as per the BCBC.***
- This condition will be met.
- ***Designer to verify the travel distances in the parkade to meet the BCBC.***
- This condition will be met.
- ***Generic note: Designer to ensure the spacial separations and unprotected openings are as per the BCBC.***
- This condition will be met.

We look forward to working with you and staff to move this project forward to meet the goals and vision of the Burnside Gorge Neighbourhood Plan.

Thank you,



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