



Committee of the Whole Report For the Meeting of March 12, 2026

To: Committee of the Whole **Date:** February 26, 2026
From: Karen Hoese, Director, Planning and Development
Subject: Rezoning Application No. 00889 for 1520 Blanshard Street – Issues Report

RECOMMENDATION

That Council decline the rezoning application for 1520 Blanshard Street (Rez. No. 00889).

PURPOSE

This report provides Council with an early analysis of core issues regarding a development application for the property located at 1520 Blanshard Street in the Downtown. This report does not provide a comprehensive analysis of the application for Council's consideration, but rather an early opportunity to consider if the application should proceed given the notable contradictions with City policy.

The proposal is for a 35-storey, primarily strata residential building at a density of 7.85:1 floor space ratio (FSR) and a height of 118m. The application is inconsistent with the general pattern of land use envisioned in the recently adopted Official Community Plan (OCP) and contradicts the urban form identified for the downtown, as well as other key OCP policies. It is also notably inconsistent with the more specific policies in the Downtown Core Area Plan (DCAP), including the envisioned densities, heights and uses.

Given these contradictions, advancing consideration of the application in its current form would result in a need for City policy to be wholly reconsidered for this area. As the applicant has indicated that they do not wish to make the substantive changes required to come into general alignment with the City's land use framework, staff are bringing this to Council's attention now, prior to undertaking a comprehensive review.

KEY CONSIDERATIONS

Relevant considerations include:

- The application is inconsistent with the land use objectives of the OCP and the requirements of DCAP – an insufficient proportion of employment uses is proposed.
- The OCP emphasizes a mix of employment uses for a thriving regional core and Central Business District (CBD). As this site is part of the CBD, residential densities envisioned in

DCAP are capped to ensure employment uses are viable and more prominent. The proposal exceeds the overall maximum density envisioned in the DCAP (proposing 7.85:1 FSR whereas policy envisions a maximum of 6:1 FSR) and greatly exceeds the maximum for residential (proposing 6.65:1 FSR whereas policy supports 3:1 FSR). The lack of employment space and significant addition of residential in the proposal undermines the general pattern of land use intended in the OCP.

- The proposal is inconsistent with the OCP’s urban structure concept for the downtown and the height regulations of DCAP.

The proposal introduces a building height that triggers a reconsideration of the city’s development pattern and skyline, and the impact of this affects the surrounding downtown core. The proposal significantly contradicts the envisioned heights in DCAP, with a 65 per cent increase in building height (proposing 118m whereas policy envisions a 72m maximum). A 30 per cent density increase over what the DCAP supports is also proposed.

- The OCP has clear policy to consider appropriate building heights that preserve the ongoing functionality of the Victoria Harbour Airport.

The location of the proposed tower is in close proximity to Transport Canada’s Obstacle Limitation Surface (OLS) requirements for aircraft flight paths which would limit potential future changes to the OLS surface and may place operational constraints on the Victoria Harbour Airport.

- The OCP discourages externally initiated OCP amendments to the OCP. As these types of amendments have broader policy implications, when proposed, they require a more comprehensive review of the area wide policies, including facilitated public engagement commensurate with the degree of change being proposed.

For these reasons, it is recommended that the proposal is not consistent with the City’s land use framework and therefore should be declined or referred back to staff to work with the applicant on a proposal that better aligns with City policy.

POLICY AND CONTEXT

Context

The site is located between Pandora Street and Cormorant Street, on the west side of Blanshard Street (see Figure 1: Aerial Image).



Figure 1: Aerial Image

Height and Density

The OCP envisions the tallest and most dense buildings along the Douglas Street and Yates Street corridors, following the natural topography of the city. Figure 2, illustrates the intended urban form, with a dotted red line indicating the anticipated maximum buildings heights across the city. Maintaining the city's intended urban form fosters a predictable investment and development ecosystem, adds certainty to infrastructure investments, helps to manage land speculation and supports the city identity.

This development would extend above the maximum envisioned building height by 48m, or approximately thirteen storeys. The DCAP anticipates heights of up to approximately 24 storeys or 72m and maximum densities of 6:1 FSR. The proposal is for a 35-storey building at 118m and 7.85:1 FSR. The proposed tower height therefore contradicts the OCP's Principles of Good Urban Design by introducing a new vision for the city skyline and city identity which undermines the intended urban form instead of contributing to it. One immediate outcome of this is unintended shadowing of the future city park on Blanshard Street.



Figure 2: View from Laurel Point and Urban Form

While the OCP does not specify maximum building heights or densities, it does recognize the impact that urban form has on supporting the vision in the plan, land-uses and land speculation. The new growth concept in the OCP marks a significant shift in how growth is envisioned for the city. It embraces a balanced city growth pattern; with projected growth spread across the city in low-carbon buildings instead of concentrating residential growth within the core. The proposal for a 35-storey, primarily residential building within the city's core employment lands conflicts with this newly established OCP vision.

Building height and scale also directly relates to land speculation – in simple terms, prevailing city policies play a role in informing land values, which developers purchase land at. Approval of heights and densities beyond what City policy anticipates fuels land speculation. Ultimately, land speculation increases land prices, contributes to unaffordability and undermines the vision set out within city policies, all of which the OCP specifically discourages.

The OCP also has clear policy to consider appropriate building heights that preserve the ongoing functionality of the Victoria Harbour Airport (see OCP policy 1.6.4). Transport Canada’s Obstacle Limitation Surface (OLS) overlays the southeast corner of the subject site and while the proposed tower is sited just outside the OLS, it extends well above the OLS requirements for aircraft flight paths (shown in Figure 3). The OLS limits building heights to a maximum of 70 m to 75 m at this location (meaning the proposal exceeds this limit by as much as 48m or approximately thirteen storeys) and its close proximity would limit potential future changes to the OLS surface.

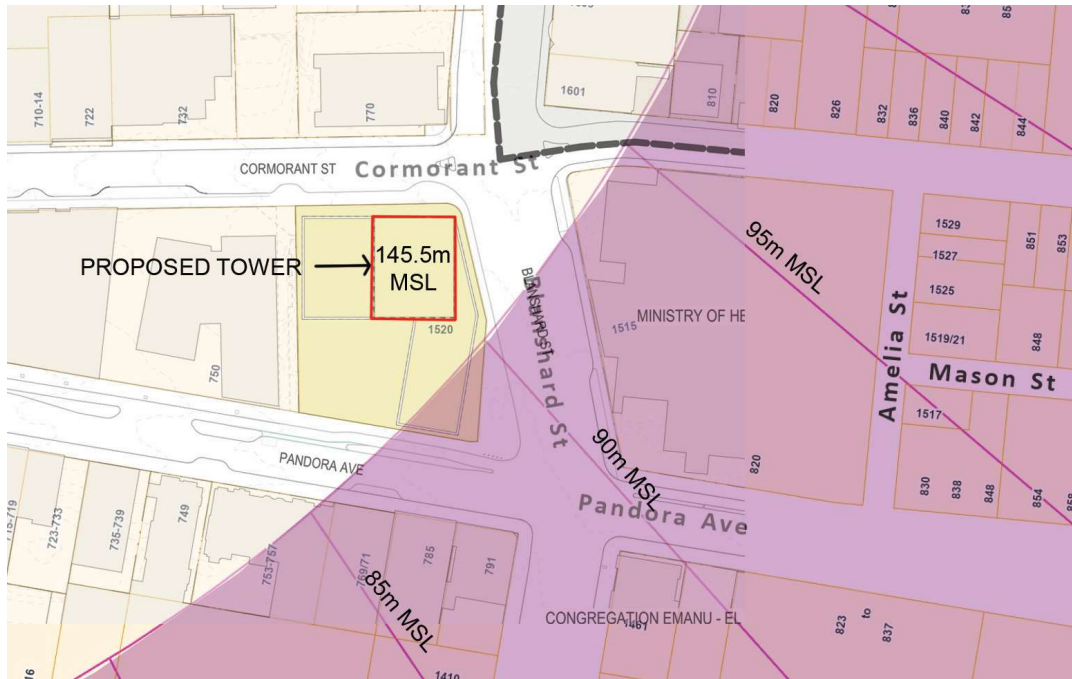


Figure 3: Object Limitation Surface (OLS)

Land Use

Residential uses are supported within the downtown core in the OCP, but policies emphasize the importance of employment lands, particularly given the area’s role as the local and regional central business district. The DCAP offers additional specificity, noting the subject site is intended to accommodate future employment growth with limits to residential uses set at 3:1 FSR.

The OCP recognizes that Victoria is forecast to add between 19,000 and 40,000 new jobs by 2050. This growth translates to a demand for between 1.6 and 4.3 million square feet of new general employment space in the coming decades. These needs are reflected in the OCP.

A recent city-initiated assessment for office demand notes that while class B and C office demand is down, class A office space continues to be strong. Furthermore, envisioned employment use is not limited to office space, rather the OCP supports a broad range of employment uses such as hotels, arts and cultural spaces and co-working spaces, which contribute to Victoria’s economic prosperity as well as enhanced liveability for residents.

The OCP plans for a twenty-to-thirty-year timeframe, which makes short term land-use trends less meaningful for long-term land use decisions. This is significant when considering the recent OCP shift to encourage a greater amount of residential growth outside of the downtown core. To support this shift, adding significant amounts of residential uses to employment lands is counterproductive.

OCP Amendment and Recommendations

Inconsistency with the OCP

The proposed built form (significantly taller and denser than what is anticipated anywhere in the downtown) and use (focused on residential rather than employment uses) both depart from the intent of the OCP's Urban Structure Concept and undermine the envisioned pattern of land use. Additionally, the proposed height puts constraints on the future flexibility of the Victoria Harbour Airport's flight paths, potentially creating challenges for future development downtown and/or the viability of the airport itself, which is recognized as a key asset to the City's economy. For these reasons, the application is inconsistent with the recently adopted OCP and an amendment would be required.

Inconsistency with the Downtown Core Area Plan

The OCP is implemented through the more detailed policies found in the Downtown Core Area Plan (DCAP) and other mid-level policy documents that were developed in close collaboration with the community. The proposal significantly exceeds the envisioned heights and densities in DCAP. It proposes 118m where 72m is envisioned (a 65 per cent increase) and 7.85:1 FSR where a maximum of 6:1 FSR is envisioned (a 30 per cent increase). It also erodes the broader intent of the DCAPs Central Business District by greatly exceeding the maximum for residential uses (proposing 6.65:1 FSR where 3:1 FSR is envisioned).

OPTIONS AND IMPLICATIONS

It is recommended that the application be declined in its current form. An alternative motion is provided to refer the application back to staff to again attempt to work with the applicant to bring it into better alignment with City policy. No alternative motion to proceed with the current application is provided and the reasons for this are discussed below.

No recommendation to proceed with the present application

This proposal departs from the intent of the OCP Urban Structure Concept and contradicts other key goals of the plan. A high degree of flexibility is built into the OCP, including the ability to consider departures from the Urban Structure Concept where a proposal meaningfully advances key City goals. However, this proposal does not meet the criteria for such departures and, to proceed, an amendment to the OCP would be required.

Given the high degree of flexibility in the OCP, when an amendment is required, it is generally because the proposal is counter to fundamental concepts, values or objectives in the plan. In this instance, the proposed development would drastically shift the agreed upon community plan not just for the site, but for the surrounding area. A tower of this height would set a reasonable tone for towers of similar height to be enabled throughout the area, the implications for which not been fully analyzed or explored with the community. Setting a precedent for buildings with primarily residential uses in the Central Business District erodes the clustered employment uses envisioned to support a healthy economy.

With a flexible OCP and the impact that amending it could have on City and community goals, site-specific amendments are generally not envisioned. Instead, more significant changes can be

explored through the five-year review cycle, where new information about evolving community needs and economic conditions can be appropriately analyzed. The OCP does provide a path for site-specific amendments to be considered if deemed appropriate by Council. However, because of the potential impact on the City's long-term goals and the disruption it would have on agreed upon plans for the surrounding area, the process expectations are high – generally commensurate with the planning and engagement expectations for a long-term district or area plan.

As part of the recent OCP adoption, Council has already provided direction to update the Downtown Core Area Plan. Proceeding with an OCP amendment process in the downtown's Central Business District in tandem with this process would be disingenuous – likely presupposing outcomes for the area. It would also raise confusion for stakeholders who are already concerned about the current and future state of Victoria's downtown and the economic health of the region and erode trust in the City's planning processes.

Since site-specific OCP amendments are generally not envisioned and since proceeding with one in this context would undermine the legitimacy of the Downtown planning process, no alternative recommendation has been provided to proceed with the application in its current form.

Declining the application (recommended)

Staff have worked with the applicant to try to bring the proposal into better alignment with City policy and have offered support in identifying potential paths forward. The applicant has indicated that they do not wish to make the changes necessary to avoid significant conflicts with City policy, resulting in this issues report and the recommendation to decline the application. Should Council move the recommended motion, the applicant could resubmit something that is in better alignment with current policy or submit a new proposal following the completion of the Downtown Core Area Plan update.

Referring the application back to staff (alternative)

Despite previous efforts to work with the applicant, staff can revisit these conversations, should Council wish to provide that direction. For full clarity to the applicant around expected changes, the alternative motion notes key issues that need to be resolved for the application to proceed. Following the resolution of these issues, staff would prepare a typical, comprehensive report and return to Committee of the Whole for consideration following a standard application review process.

CONCLUSIONS

The proposal for a 35-storey, primarily strata residential building at a density of 7.85:1 FSR conflicts with OCP and DCAP policies for land use, density and building heights which aim to preserve employment lands by limiting residential uses in this area. The proposed tower detracts from and introduces a competing vision to the city's urban form, is in close proximity to Transport Canada's Obstacle Limitation Surface (OLS) requirements for aircraft, shadows the future public park at Blanshard and Fisgard Street and exacerbates land speculation concerns, all which necessitate an OCP amendment. Therefore, the recommendation is to decline the application.

ALTERNATE MOTION

That Council direct staff to work with the applicant on a revised application that better aligns with City policy in terms of building height, density and use.

Respectfully submitted,

Miko Betanzo
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Development Services Division

Karen Hoese, Director
Planning and Development Department

Report accepted and recommended by the City Manager.

List of Attachments

- Attachment A Subject Map
- Attachment B Plans date stamped March 6, 2025
- Attachment C Letter from applicant to Mayor and Council dated February 24, 2025