



December 18, 2025

Dear Patrick,

Subject: Response to the Technical Review Group (TRG) Application Review Summary – Pemberton Woods Campus Renewal (#REZ00876)

Glenlyon Norfolk School (GNS) is pleased to submit this comprehensive response to the City of Victoria's Technical Review Group (TRG) Application Review Summary dated October 7, 2025, for the Pemberton Woods Campus Renewal project (Application #REZ00876).

GNS and our project team have carefully reviewed the TRG feedback and appreciate the guidance provided by City staff across all departments. This response represents a collaborative advancement of the application, informed by staff direction, November 26, 2025, ADP comments and reflecting the school's commitment to delivering a campus renewal that honours heritage, serves community needs, and achieves the City's urban design and sustainability objectives.

Updates include:

- **Heritage Strategy:** Added additional details and a separate page to discuss policy compliance in the new campus plan.
- **Arborist Refinements:** Updated tree management plan reflecting Parks division guidance on tree retention, removal sequencing and replacement strategy.
- **Accessibility Commitments:** The addition of accessibility guidelines across all campus phases and improved N/S components.
- **Parking Framework:** Meeting of current Schedule C compliance as determined by Zoning Staff, but allowing for and thinking about flexibility for future Schedule C revisions in the future, where parking requirements are reduced and allowing for—within the application zoning structure and site plan—future build out of surface parking locations.
- **Zoning Flexibility:** Refinements and added details to the proposed comprehensive zoning framework update, demonstrating how the Comprehensive Development (CD) Zone enables additional density, simplifying setbacks and adaptive reuse of the southeast surface parking area as parking standards evolve.

This response addresses each item raised in the TRG summary, organized by the departmental review section. Responses confirm revisions made to reflect TRG

t: 250.370.6800
www.mygns.ca

Junior School
1701 Beach Drive
Victoria, BC, Canada
V8R 6H9
f: 250.370.6853

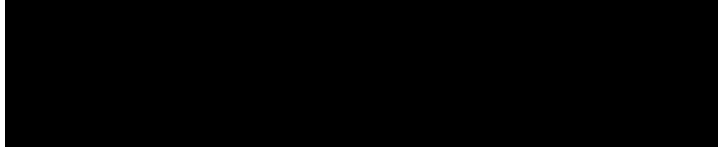
Middle and Senior Schools
781 Richmond Avenue
Victoria, BC, Canada
V8S 3Z2
f: 250.370.6811



feedback and provide policy context where clarification will support staff and Council decision-making.

We look forward to advancing this application toward the Committee of the Whole consideration, and thank you for the collaborative engagement throughout this process.

Sincerely,



Chad Holtum
Head of School

TRG Response - Pemberton Woods Renewal

Date: December 18, 2025

Application: REZ00876

Address: 731, 735, 781 Richmond Avenue; 724, 730, 736 Maddison Street; 728, 729, 733 Laurentian Place

1.DEVELOPMENT SERVICES DIVISION COMMENTS

1.1 OFFICIAL COMMUNITY PLAN (OCP)

1.1.1 Staff Comment:

A new OCP has been adopted and identifies the subject properties as Parks, Institutions and Public Open Spaces (the main school campus) and the Residential Fabric (Richmond Priority Growth Area). The Residential Fabric envisions primarily residential-oriented uses but may include a mix of commercial and community-serving uses.

Applicant Response

Acknowledged. The application aligns with these proposed OCP designations. The renewal plan strengthens the role of the Pemberton Woods campus as an educational institution while ensuring compatibility with the residential context along Richmond Avenue. Setbacks, landscaping, and careful building massing along Richmond respond directly to the Residential Fabric designation and respect the neighbourhood edge.

1.1.2 Staff Comment:

Public uses that include schools are broadly enabled and supported anywhere in the city if consistent with this plan's Principles of Good Urban Design. The OCP supports educational institutions in facility planning in the context of growth and urbanization and work collaboratively to meet shared objectives for education and community wellbeing in any redevelopment or altering of properties.

Applicant Response

The renewal of the middle and senior school campus reflects the OCP's support for educational institutions and demonstrates a commitment to the Principles of Good Urban Design through pedestrian permeability, public realm improvements, and safe, modern facilities. The School has engaged in detailed and comprehensive engagement with staff, alumni, and the neighbourhood to ensure the renewal supports both educational needs and broader community objectives. The design incorporates community feedback and balances institutional needs with neighbourhood character.

1.1.3 Staff Comment:

The proposal generally contributes to objectives related to identified OCP Community Networks, which includes retaining and improving arts, learning, sport and recreational facilities.

Applicant Response

Acknowledged. The renewal plan strengthens the campus's role as a regional educational facility and improves recreational amenities including enhanced athletic facilities, sports fields, and the double-sized gymnasium available for community use. The site design supports the OCP's Community Networks objectives by retaining and modernizing critical learning and recreational infrastructure.

1.2 ZONING REGULATION BYLAW

1.2.1 Staff Comment:

A portion of the development site (all properties previously zoned R1-G, Gonzales Single Family District) are zoned GRD-1 Zone. The zone permits assembly uses, which includes a private school within that defined use category. Therefore, the proposed uses are now permitted across the site.

Applicant Response

Acknowledged. While the emerging GRD-1 Zone would technically permit institutional uses, as previously noted, it does not provide the clarity or structured flexibility required for a multi-decade renewal of the Pemberton Woods campus. A Comprehensive Development (CD) Zone provides one clear framework for the entire campus, ensuring consistency with City policy and enabling the phased renewal approach necessary for institutional facility planning. The CD Zone, supported by site-specific design guidelines and a Master Development Agreement, provides the structured framework that reflects the site's long-standing institutional role.

Comprehensive Development Zone—Specific Provisions (Section 10.3 resubmission booklet)

The proposed CD Zone will establish the following specific parameters for the Pemberton Woods Campus Renewal:

Lot Area and Consolidation:

The proposed development consolidates nine individual parcels into a single unified lot, allowing for comprehensive implementation of the long-term campus plan and any necessary phasing components. This consolidation supports phased renewal, coordinated site planning, and provides flexibility to accommodate educational, residential, and community-serving uses across the site.

Floor Space Ratio (FSR) and Density:

- Overall Density: The CD Zone is proposed to permit a maximum Floor Space Ratio (FSR) of 0.65:1 across the site. This density supports the space requirements of a contemporary educational campus while remaining compatible with the surrounding neighbourhood and the OCP's direction for institutional lands. The FSR reflects the realistic space needs for modern educational facilities while respecting neighbourhood character expectations.
- Rental Townhouse Component: The residential component will be drawn from the overall FSR limit. Given the site will be one single lot, these homes have been designed to deliver needed rental housing while maintaining appropriate transitions to adjacent residential properties and respecting the overall massing strategy.

Building Height and Setbacks:

- Maximum Building Heights: Heights within the CD Zone will be regulated using maximum geodetic elevations, rather than storey counts or existing grade conditions. This approach aligns with the City's updated zoning framework and provides consistent, predictable height limits across the site, independent of topographic variation. Geodetic caps will ensure building massing remains respectful of the neighbourhood while meeting the functional needs of the campus.
- Height Transitions: Geodetic height limits will step down toward all site edges, keeping the tallest buildings centralized within the campus and ensuring a smooth transition to the lower-scale residential context surrounding the site.
- Minimum Setbacks: A consistent 6m setback will apply along all property lines, creating clear separation from neighbouring homes, improving privacy, and maintaining a landscaped perimeter around the campus.

Site Coverage and Open Space:

- Maximum Site Coverage: Building coverage will be limited to a maximum of 50% of the site. This maintains a balanced campus layout with generous open spaces, pedestrian routes, and landscaped areas.
- Landscaped Areas: A large portion of the site will remain as landscaped open space, including gardens, lawns, tree-lined walkways, and passive gathering spaces. These spaces will provide recreational opportunities for students, staff, and the community.
- Outdoor Learning and Play Areas: Purpose-built outdoor areas will be integrated throughout the campus to support learning, recreation, and student wellness.
- Community Gardens: Designed garden plots will offer opportunities for community engagement, urban agriculture, and student-led programming.

Impervious Surface and Green Infrastructure:

Where feasible, the school will incorporate green infrastructure, such as permeable paving, rain gardens, and enhanced landscape areas, to reduce stormwater runoff and improve environmental performance.

Parking and Schedule C Compliance:

- Parking and Schedule C Compliance: The school is requesting that the CD Zone reflect the clear outcome of neighbourhood engagement, where residents asked the project to meet Schedule C parking ratios without reductions. The renewal plan has therefore been designed to fully comply with current Schedule C requirements through a combination of underground parking and the southeast surface lot.
- Future Flexibility for SE Surface Parking: Because the City is reviewing Schedule C parking regulations, the CD Zone is also structured to allow future flexibility. If parking requirements are reduced over time, the southeast surface lot could be re-evaluated for redevelopment as a future building site or another institutional, residential, or community-serving use, all of which are supported under the new OCP. This ensures the school meets today's parking requirements in a responsible and transparent way while preserving the opportunity to create more campus options in the southeast corner over the long term.

Flexibility and Phasing:

The CD Zone provides clear and structured flexibility for phased renewal across multiple decades. Each Development Permit application will be assessed against both City-wide design objectives and these campus-specific guidelines, ensuring consistency throughout renewal while accommodating necessary adaptations to educational and municipal policy evolution.

1.2.2 Staff Comment:

The remaining R1-B portion of the site remain under current zoning until a subsequent phase of the comprehensive review process. Phase two is expected to include zoning regulations pertaining to parks, institutional, community/cultural and employment uses. Until this time, the R1-B portion of this site is limited to 0.5:1 FSR; therefore, a rezoning is justified to permit the proposed residential buildings as shown and to allow for density to exceed 0.5:1 FSR between phases, as outlined in the conceptual phasing plans.

Applicant Response

Acknowledged. The School is committed to coordinating with staff to ensure that the work completed under Phase 2 of the City's zoning review aligns with the long-term renewal plan. We respectfully request that if supported by Council, the CD Zone, along with campus-specific urban design guidelines, be incorporated into Phase 2 work to provide continuity and certainty for the multi-decade renewal process.

1.3 PROPOSED DEVELOPMENT PERMIT AREA

1.3.1 Staff Comment:

The subject properties are within Development Permit Area 1: General Urban Design. The following guidelines are applicable: Schedule 2A: General Urban Design Guidelines (2025), with special attention to Part 2: Design Guidelines, Part 3: Special Considerations, and Section 3.1 Accessibility. New development should seek to conserve, protect, or restore major ecological assets. A full assessment of consistency will be completed with future Development Permit applications. More general design comments are provided in this document. The draft design objectives contained in the submission include useful and site-appropriate guidance. Please consider including objectives related to prioritizing heritage and tree retention through site and building design to supplement the city's general guidelines with site realities (i.e., priority features for retention) and refer to recommendations provided by the Advisory Design Panel.

Applicant Response

Acknowledged. The School appreciates staff guidance to expand site-specific design objectives. The resubmission includes enhanced design objectives addressing the following priority features for retention:

Heritage Priority Features:

- Norfolk House School for Girls: Adaptive reuse and/or on-site relocation to maintain educational institutional use and character-defining architectural elements
- Gymnasium: Retention where operationally feasible, with restoration of character-defining features
- Identified Garry oak trees (Tree 421 and others): Retention through design that works around critical root zones

Tree Retention Priorities:

- Significant Garry oak (Tree 421) and established specimen trees to be retained through design modifications (hard surfaces above critical root zones, reduced grading impacts, arborist supervision)
- Native species replacement plan emphasizing medium-sized trees where soil volume permits
- Enhanced canopy coverage across the site through strategic replacement and native planting

Accessibility Commitment (Section 9.3 booklet):

The School is committed to implementing Accessibility Guidelines across all campus phases. Key commitments include:

- **Universal Design Principles:** All new buildings and public realm areas designed for accessible entry, circulation, and use by people of all abilities
- **Pedestrian Connectivity:** Accessible pathways linking campus to Pemberton Park, public transportation, and neighbourhood destinations with appropriate slopes, surfaces, and wayfinding
- **Accessible Parking and Loading:** Strategic placement of accessible stalls with easy transition to building entries; accessible loading/drop-off areas separated from student activity zones
- **Accessible Public Spaces:** Campus gathering areas, recreational facilities, and multi-use spaces designed to accommodate diverse users
- **Phased Implementation:** Accessibility enhancements secured in Development Permit conditions with commitment to deliver compliant facilities in each phase

The School will work with staff to ensure detailed accessibility design is confirmed at the Development Permit stage and that future phases maintain and enhance accessible connections across the evolving campus.

1.4 SITE DESIGN COMMENTS

1.4.1 Staff Comment:

An improved public realm interface of the proposed southeast parking lot with Richardson Street is encouraged.

Applicant Response

Acknowledged. The School understands the importance of the Richardson Street frontage and actively seeks further staff direction on preferred treatments. Parking has been a central design challenge throughout this project, balancing Schedule C compliance, construction feasibility, and operational needs.

The hybrid parking approach (80 underground stalls + southeast surface lot) represents a significant commitment: the 80 underground stalls exceed provincial standards and represent the practical engineering limit given the need to accommodate the gymnasium and athletic fields. Fully undergrounding all parking would compromise athletic facilities and introduce prohibitive cost impacts.

For the southeast surface lot, the School proposes:

- Permeable pavers and stormwater capture to reduce visual and environmental impact

- Flexible design accommodating landscape features and seasonal programming
- Structured flexibility within the CD Zone to enable this area's conversion to other compatible uses (institutional space, daycare, housing) if parking standards are reduced in future

1.4.2 Staff Comment:

Consider opportunities for a small community gathering space and/or a small facility fronting Madison (e.g., a field house serving the sports field). Refer below to heritage comments; potentially relocation of a heritage value building to this space would achieve both heritage and urban design objectives.

Applicant Response:

Acknowledged. The School is committing significant investment to enhance the public realm at the Southern edge of the campus, specifically at the intersection of Maddison Street and Richardson Street, which is the key entrance to the planned Maddison Greenway corridor.

Public Realm Investment:

The updated design includes a new GNS Gateway Feature, feature paving, and seating nodes in this area. This offsite work enhances the public interface, improves the greenway entrance, and serves as the School's primary public space contribution at this corner. (see pg 61 of the booklet)

Community Facilities and Feasibility:

- The idea of a formal community gathering space or field house fronting Maddison was rejected during co-design engagement (2023/24), as neighborhood residents expressed concerns that such a facility would lead to noise and nuisance within the future greenway.
- If a dedicated, non-school-specific community facility is pursued, it would need to be explored as a cost-shared initiative with the City to ensure financial feasibility, maintenance, and long-term community alignment.
- Heritage relocation to this complex corner is deemed technically unfeasible due to site constraints (including protected trees and campus safety requirements) as detailed in the Heritage Assessment. The site design prioritizes the essential public realm gateway over accommodating a relocated structure here.

1.4.3 Staff Comment:

The guidelines encourage additional walkways to improve connections to community uses such as parks and schools. Increased pedestrian permeability through the site, ideally including a semi-public north–south connection between

Bank Street and Laurentian Place, is encouraged. Acknowledging the outlined priority to ensure school safety consideration, this could include design revisions to improve accessibility and improved line of sight without SRW to permit semi-public access.

Applicant Response

The School recognizes the value of pedestrian connections to community uses and has incorporated improved pathways linking the campus with Pemberton Park and other key access points. However, the suggestion of a semi-public north–south connection between Bank Street and Laurentian Place does not align with the historic pattern of the site, the operational needs of a functioning school campus, or community priorities identified through engagement.

While we appreciate staff's suggestion to explore design refinements that might improve accessibility and line of sight, introducing a mid-block north–south corridor would fundamentally compromise student safety and secure campus operations. As indicated at ADP in November, the design panel reviewed and supported the existing design but did indicate support for accessibility. To that end the application now includes a section in the booklet that will include the implementation of this item site wide to provide a fully accessible environment for all visitors and users of the campus.

1.5 VEHICLE PARKING AND MOVEMENT COMMENTS

1.5.1 Staff Comment:

As previously noted, the previously noted amendments to parking regulation were not included in policy changes adopted this year, with regulatory work still ongoing. However, as a rezoning application without a concurrent development permit application, emerging parking regulations will be applicable to all subsequent development permits. The anticipated new parking regulations are not expected to change the base supply rate for the commercial component of required vehicle parking. The zoning check based on current regulations confirmed a base rate of 46 spaces for elementary/middle school floor area and 116 spaces for secondary school floor area.

Applicant Response

Acknowledged with important clarification. The School recognizes that emerging parking regulations are under development and anticipates these will apply to future Development Permit applications, not the current rezoning stage. Per the latest Zoning Plan Check (November 6, 2025), the application is structured to fully meet current Schedule C requirements: 182 total parking stalls (162 for school, 19 for residential) plus 1 visitor space. This commitment reflects:

1. Community Engagement Direction: Extensive neighbourhood consultation clearly established that full parking compliance was essential. The School is not seeking variances or reductions at rezoning stage.
2. Operational Reality: Schools require surface parking for:
 - Accessible/turn-around stalls
 - Short-term event circulation
 - School bus staging
 - Staff turnover during peak hours (arrival/dismissal) All of these needs are distinct from residential or commercial parking demand and cannot be compressed into forecast models.
3. Hybrid Approach Feasibility: 80 underground stalls represent the practical limit without compromising athletic facilities. The southeast surface lot (80+ stalls) is essential for operational functionality.

Future Parking Standard Evolution:

The School fully supports reduced parking standards as the City adopts them. To enable seamless transition:

1. **CD Zone Flexibility:** The Comprehensive Development Zone will be drafted to provide explicit flexibility for converting the southeast surface parking area to other compatible institutional, residential, or community uses if Schedule C requirements are reduced by Council
2. **Development Agreement:** A Master Development Agreement will articulate the parking commitment for the initial phase and establish a review mechanism that permits phasing adjustments if City standards change
3. **Fiscal Reality:** If parking standards are reduced, the freed-up land becomes available for enhanced amenity, additional housing, or institutional space, benefiting both the school and the neighbourhood

1.5.2 Staff Comment:

However, the overall parking requirements would be eligible for reduction, without vehicle parking variances, due to a geographic reduction of 30% within 200m of the Transit Priority Network. Therefore, the total required vehicle parking for this site would be reduced by 30% (48.6 spaces) if new regulations are approved as recommended to Council. Similarly, the residential base rates are expected to be reduced to 0.75 per unit for smaller units and 0.9 per unit for larger units (currently 0.9 and 1.3 respectively). The zoning check confirmed that 18 spaces would be required under current regulations and this would be reduced to 15 spaces if approved as proposed.

Applicant Response

We appreciate staff's clarification on the anticipated parking regulation changes. As noted in the previous response the School recognizes that emerging parking regulations are under development and anticipates these will apply to future Development Permit applications, not the current rezoning stage.

This application has been structured to fully meet current Schedule C standards (181 stalls), Consistent and is not seeking any reduction or setting parking levels specific to the existing use. We simply will follow policy of the day at the request of the commitment to the community. Community engagement provided clear direction from neighbourhood residents not to seek reductions at this time. The application reflects current policy compliance.

However, recognizing that the City is actively reviewing parking standards, the CD Zone is also structured to provide future flexibility. Because the site will remain under single school ownership throughout all phases, the CD Zone can be designed to allow the southeast surface parking lot to be re-evaluated for alternative uses if and when parking requirements are reduced. This provides:

- Current Compliance: Full Schedule C compliance (181 stalls) meeting neighbourhood expectations and current policy
- Future Adaptability: If parking standards evolve, the southeast surface lot could be repurposed for institutional space (educational facilities, daycare, offices), residential uses (additional housing), or community-serving uses—all of which are supported under the new OCP
- Responsible Stewardship: The School meets today's parking requirements transparently while preserving the opportunity to create additional campus options in the southeast corner over the long term.

Should revised standards be adopted by Council in the future, those will apply at the Development Permit stage. The CD Zone and Master Development Agreement will formalize this flexibility provision, ensuring the southeast lot can be responsibly repurposed if parking standards evolve.

1.6 HERITAGE ASSESSMENT

1.6.1 Staff Comment:

Thank you for providing the Heritage Assessment for the Norfolk School House for Girls and the Gymnasium prepared by Luxton Heritage Consultants, dated February 10, 2025. The historic information, the documentation and assessments are appreciated and are useful in

determining that the historic buildings do in fact have sufficient heritage value and merit to warrant their retention through a thoughtful conservation approach.

Staff have determined that the heritage value for the Norfolk House School for Girls can be defined as follows:

- Historical: linked to the early development of independent schools in the city and a unique example of construction during the Great Depression*
- Association with well-known and prolific architect Percy Leonard James*
- Association with the original Norfolk House School for Girls, established by Miss Julia McDermott and Miss Dora Atkins*
- Continuous-use as an educational institution*
- Architectural Expression – British Arts & Crafts – although alterations have been made over the years, many of its character-defining elements remain and/or could be restored.*

Applicant Response

The School is grateful for staff's analysis of the heritage value of the Norfolk House School for Girls. We acknowledge the significance of our history, its association with Percy Leonard James, our role in Victoria's educational development, and our continuous use as an educational institution. We have been the steward of this building since its construction and understand deeply its place in both GNS and Victoria's heritage.

Understanding the Policy Context:

Staff notes that "the city's current and anticipated new policies relevant to new development encourages heritage retention and conservation even where the buildings do not currently have protected heritage status if they have heritage merit, and the application to rezone with the intent to demolish the buildings without their retention or integration into the new design is not supportable from a heritage policy perspective."

The School understands this position and has reviewed it carefully in light of the new Rezoning and Development Policy. It also has provided deep context to the role it has played and the challenges our future use and third party assessment. The approach and decision made by the school is of significant contextual importance. The retention and or complete conservation simply is not possible. Further the tiered approach in Section 10 establishes that when Section 10.1 retention/relocation options are professionally documented as infeasible, comprehensive Section 10.2 integration (heritage conservation through documentation, interpretation, and design references) constitutes appropriate policy compliance.

Why Section 10.1 Retention/Relocation Is Not Feasible:

Purely from a professional review as requested by Staff, the Luxton Heritage Assessment concluded that the Norfolk House School for Girls has "historical value but low integrity due to significant alterations" and is not "a candidate for conservation in place." The assessment documented:

1. **Structural and Integrity Challenges:**The building has undergone extensive alterations over decades. While character-defining elements remain, the overall structural integrity and operational functionality have been compromised by these changes. The report notes that restoration to heritage standards would require substantial intervention.

2. **Site Constraints—Section 10.1 Option A (On-Site Retention):**The current application proposes retention of the existing athletic fields as central to the campus renewal and community commitment. The fields were identified through community engagement as a priority for retention and expansion. The Norfolk House building occupies space that is essential for athletic operations. Retaining the building in place would require relocating or eliminating athletic facilities, which directly contradicts the school's institutional program and community-negotiated design priorities.

3. **Site Constraints—Section 10.1 Option B (On-Site Relocation):** Staff suggest "reaching out to a building relocation company to determine the feasibility of partial deconstruction and relocation onsite." The School appreciates this suggestion and has explored relocation options. However:

a. **Physical Constraints:**The site's topography, utility infrastructure, protected tree locations (including the significant tree OS8 noted in the Road Dedication discussion), and archaeological sensitivity create physical constraints that severely limit relocation options. The Luxton Report notes that the site includes athletic fields, parking, utilities, and protected landscape features that constrain placement options.

b. **Program Feasibility:** Adaptive reuse of the Norfolk House for "educational administration, housing, offices, retail, or student and faculty amenity space" as suggested by staff would require substantial structural intervention and does not align with the phased renewal program. The application prioritizes:

- New administrative facilities in the renovated Admin Building
- Residential units in townhouses designed to match neighbourhood character
- Student amenities integrated into new learning and athletic facilities

Relocating a historic building to provide redundant administrative or student space would create significant alterations to the current plan and significantly impact the

year long engagement co-design of the campus with all stakeholders. It further increases capital costs, and conflicts with the pedagogically- focused masterplan developed through community engagement.

c. *Cost and Feasibility*: Partial deconstruction and relocation of a 1930s building would require structural assessment, temporary stabilization, relocation logistics, and reconstruction on a new site. This represents substantial capital investment for a building that, even after relocation, would require extensive restoration due to its documented low integrity.

4. **Structural Assessment**: Staff note that "a structural assessment was not completed as part of the site review, which would be beneficial to help inform the viability of retention on- or off-site." The School seeks clarity to why a structural engineering assessment if the Luxton Report's documentation already noted that significant alterations and compromised integrity suggests that such an assessment would likely confirm limited viability for on-site or off-site relocation without substantial intervention.

The Section 10.2 Approach—Appropriate Heritage Conservation:

Given these constraints, the School proposes comprehensive Section 10.2 heritage conservation (newly added Section 4.6: Campus Heritage Integration), which is supported by the new Rezoning and Development Policy and aligns with the Standards and Guidelines for the Conservation of Historic Places in Canada. This approach includes four specific and lasting commitments:

1. Comprehensive Documentation Before Deconstruction

GNS will complete full professional documentation of both heritage buildings, including measured drawings, high-resolution photography, and a written record of their role in the School's history. This creates a permanent archive for future students, alumni, and the community, ensuring the buildings' stories are preserved even as their physical forms evolve.

2. Salvaged Materials Reinstalled in New Admin Building:

Several surviving character-defining elements will be carefully removed, restored, and permanently incorporated into the new Administration Building, including:

- The original inscribed wood panel (a foundational heritage artifact)
- Select woodwork and trim from the original structure
- Surviving architectural details and pendant fixtures

These elements will be presented in a way that highlights their origin and meaning, creating a tangible connection between the renewed campus and its heritage roots.

3. Heritage Interpretation Across the Renewed Campus:

As the campus renewal phases progress, outdoor interpretive features will be added to celebrate the School's heritage story:

- Interpretive signage with historic photographs documenting the buildings and their role
- A small heritage-inspired garden incorporating salvaged architectural pieces
- A commemorative pathway linking the historic campus location with new learning spaces

These elements will be introduced individually across phases, ensuring the heritage story remains visible and accessible throughout the site.

4. Thoughtful Design References in Landscape and Architecture

An approach reflecting recognized heritage practice that values both the physical and cultural aspects of heritage. It acknowledges that an equally meaningful way to honour a building's legacy is through careful documentation, reuse of significant elements, and the integration of its stories into a renewed environment, one designed to serve the school and neighbourhood safely, sustainably, and effectively for generations to come.

Specifically:

- Landscape design will reference the early campus character, incorporating architectural pieces salvaged from the original buildings and planting species associated with the early campus development.
- Seating and gathering spaces will be designed for quiet reflection, remembering the site's educational heritage.

Ongoing Heritage Stewardship:

A Heritage Interpretation Plan will be secured through the Master Development Agreement, ensuring that heritage commitments are binding and comprehensively implemented across all phases of renewal.

1.7 OTHER POLICY UPDATES

1.7.1 Staff Comment:

The Gonzales Neighbourhood Community Plan has been rescinded. The Tenant Assistance Policy has been rescinded and replaced with a Tenant Protection Bylaw. The Family Housing Policy has been rescinded and replaced with new general regulation in the new zoning bylaw.

The following requirements apply:

- For Buildings Three Storeys or less, at least 30% of Dwelling Units must have three Bedrooms or more*
- For Buildings greater than Three Storeys, at least 10% must have three Bedrooms or more and an additional 20% must have two Bedrooms or more*
- Tax Exemptions are available for new rental housing development*

Applicant Response

Acknowledged. The School is aware of the new policy requirements and will ensure that the residential component complies with family housing requirements. The proposed 16 rental townhouses will be designed to meet the three-bedroom requirement, with unit mix and sizes to be confirmed at the Development Permit stage.

The School is also aware of the Tenant Protection Bylaw and the availability of tax exemptions for secured rental housing. We will explore eligibility for the 10-year tax exemption on the increase in assessed value to support the viability of the rental housing Component. The application does not seek any variances or change to these new policy measures and will meet such measures at time of Development Permit if this application is successful.

2. Engineering and Public Works Department Comment

2.1 Land Development Review

2.1.1 Staff Comment:

Laurentian place closure discussions are ongoing. Council direction is required prior to moving forward with closure.

Applicant Response

Acknowledged.

2.1.2 Staff Comment (Information):

Electrical drawing showing all proposed frontage improvement works and SRW pathway lighting.

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The applicant is required to retain the services of a Qualified Professional for any project requiring excavation and disposal of soil. Soil assessment must include samples from proposed service trench locations. A Street Occupancy Permit from Transportation Engineering will be required for work in the roadway. Prior to commencement of excavation, contractors shall be registered under Bylaw 14-071, Schedule G. Contact Adam Steele, Stormwater Management Specialist, at 250.361.0318 or asteele@victoria.ca to register.

Applicant Response

Acknowledged.

2.2 Transportation Review

2.2.1 Staff Comment (Information):

The applicant response indicates frontage improvement scope boundaries at centerline in alignment with Subdivision and Development Servicing Bylaw. Staff recommend that as a condition of rezoning Council require frontage improvements including beyond centerline at locations to meet full objectives. New guidance from the recently adopted OCP have been previously included in recommendations for mobility and aligned with networks including the future Frequent Transit Network on Richmond & Linear Parkway Opportunities on Greenways. Staff encourage the applicant to consider the City's goals of a low-carbon mobility mode shift that will improve quality of life, road safety and reduce on-road transportation emissions. Staff continue to recommend the applicant consider TDM measures for both staff, residents and school participants.

Applicant Response:

The School appreciates staff's guidance on frontage improvements and mobility objectives. The School is open to exploring frontage improvements "beyond centerline at locations to meet full objectives" in collaboration with staff. We note that this could create opportunity for enhanced pedestrian and cycling infrastructure aligned with the OCP's Frequent Transit Network and Linear Parkway objectives, particularly along Richmond Avenue. Costs and scope of work should be considered on existing policy when applicants are requesting additional work beyond their half of the frontage. The applicant would only seek a reimbursement from the City if and when they or a neighbouring development were to be developed within 10 years of the offsite improvement and

have their contribution to the offsite be provided back to the School. This can be included within the Master Development Agreement.

With respect to Transportation Demand Management (TDM): While the school is not formally submitting a TDM plan given the strong request of neighbours to meet Schedule C requirements. The School is and will continue its work to support the City's low-carbon mobility goals. Measures under consideration for implementation in the long term include:

1. Transit Support: Open partnership with BC Transit to enhance service frequency and routing to serve school drop-off/pick-up and staff commutes. The site's location near the Transit Priority Network supports this objective.
2. Active Transportation: Implementing more bicycle parking for students and staff, pedestrian pathways with clear wayfinding, and safe crossing infrastructure. The proposed east-west multi-use pathway (3m) and pedestrian pathways provide direct connections to Pemberton Park and community facilities.
3. School-Based Programs: GNS is looking to implement a Walking School Bus program and encourages cycling. The renewed campus will have dedicated secure bicycle facilities to support these initiatives.
4. Event and Visitor Management: For large events, the School will develop event-specific parking and transportation management plans.

2.2.2 Staff Comment (Information):

Provision of a grade raised marked crosswalk complete with Rapid Rectangular Flashing Beacons (RRFB), will be required with electrical connection, conduit, junction boxes, civil improvements on both sides of Richmond. Provision of a continuous sidewalk across Maddison at Richmond intersection will be required. Provision of intersection upgrades at Maddison at Richardson will be required to create a pedestrian prioritized plaza area. Provision of a marked crosswalk upgrade complete with RRFB will be required on both sides of Richardson. Fire access design to be refined. Dedication on Richardson Rd (up to 1.34m) is recommended to be secured as a condition of rezoning.

Applicant Response

Acknowledged. The School understands the following will be required:

1. Grade-raised marked crosswalk with RRFB on Richmond Avenue (both sides) - electrical connection, conduit, junction boxes, and civil improvements
2. Continuous sidewalk across Maddison at Richmond intersection with civil improvements

3. Intersection upgrades at Maddison and Richardson to create pedestrian-prioritized plaza
4. Marked crosswalk upgrade with RRFB on Richardson Avenue (both sides)
5. Fire lane design refinement (see Fire Department comment below)
6. Road dedication (up to 1.34m on Richardson) as a condition of rezoning

The School is committed to these improvements and will work with City staff to finalize design details at the Development Permit stage. Again as per 2.2; those areas beyond half distance can and should be part of a cost sharing or cost recovery plan if further work is completed on neighbouring or adjacent to the application area. The legal survey has been updated to reflect the 1.34m dedication on Richardson. These frontage improvements are significant and are of significant value to the City.

2.3 UNDERGROUND UTILITIES REVIEW

2.3.1 Staff Comment (Information):

The applicant is required to retain the services of a Qualified Professional for any project requiring excavation and disposal of any volume of soil for the purpose of characterizing the soil and determining a suitable disposal facility. The soil assessment must include samples from proposed service trench locations, with a report to be provided to the City. This is required to allow the City to provide the most accurate estimate and to install the new services most efficiently. Additionally, soil from a property with a current or former BC CSR Schedule 2 Activity must comply with provincial soil relocation requirements, including the one-week notification period prior to soil relocation.

Applicant Response

Acknowledged.

2.4 STORMWATER MANAGEMENT REVIEW

2.4.1 Staff Comment (Information):

The City encourages Green Stormwater Infrastructure (GSI) and offers financial incentives for properties to manage rainwater on-site. The City supports and encourages the use of permeable surfaces for parking stalls and other hard surfaces, rain gardens, and green roofs. The property owner may be eligible for financial incentives if designs meet City Rainwater Management Standards.

Applicant Response

Acknowledged. The School is committed to incorporating Green Stormwater Infrastructure throughout the renewed campus.

3. PARKS DIVISION COMMENTS

3.1.1 Staff Comment (SRW and Road Dedication):

Please confirm the intended ground and surface treatment between the proposed SRW and tree OS8. Please acknowledge that prior to execution of the Road Dedication, the Applicant is required to survey and scale the trunk of tree 421 to confirm the ownership percentage following dedication. Please acknowledge that prior to execution of the Road Dedication the Applicant shall undertake any identified work prior to Parks accepting the partial tree into inventory.

Applicant Response

The School appreciates the clarification provided by Parks and confirms its commitment to meeting these requirements. Given the multi-decade buildout of the Pemberton Woods Campus Renewal including the road dedication not being implemented now as part of the Rezoning but later during the Development Permit process, the School also seeks to ensure that these steps occur in a logical and practical sequence aligned with the phasing of civil works on Richmond Avenue.

For the purposes of rezoning (Committee of the Whole), GNS confirms the following:

- Prior to Completion to Road Dedication which will occur prior to Development Permit, the School will engage a qualified arborist to survey and scale the trunk of Tree 421 prior to execution of the Road Dedication in order to confirm ownership percentage following dedication.
- The School acknowledges that any remedial or arboricultural work identified through that survey must be undertaken prior to Parks accepting the partial tree into inventory.
- The School will confirm the intended ground and surface treatment between the proposed statutory right of way and tree OS8 as part of the detailed design stage.

With respect to implementation, GNS wishes to remind Parks that given the renewal will occur in phases over 25 to 30 years and that the Richmond road dedication works will be a requirement at that stage as formalized in a Master Development Agreement tree reviews will be completed at the time of actual road dedication being completed. The School will therefore complete the required survey, assessment, and any associated remedial work at the point when the relevant phase of civil design occurs at that Development Permit. This approach ensures the work is accurate, timely, and coordinated with the specific construction conditions present at that time.

GNS will continue to work closely with Parks staff and the project arborist at each phase to ensure full compliance with the Tree Management Plan and the City's requirements.

3.1.2 Staff Comment (Arborist Report and Tree Replacement Plan):

Please revise the Tree Management Plan to exclude Trees M8 and M16 as existing trees as they have been removed by the City of Victoria. Please indicate the previous locations of trees M8 and M16 as proposed Municipal trees. Please indicate Tree M6 as a removal at this stage, given the likelihood of removal at future phases when more detailed design is determined. Please acknowledge and confirm a commitment, at BP phase, to propose a design which facilitates installing hard surfaces above tree roots of protected trees as recommended in the Arborist Report. Retention of several bylaw-protected trees depends on use of these specifications. Please acknowledge that removal of any shared trees will require approval in writing from the neighbouring property at future phases.

Applicant Response

The Arborist Report has been revised and is attached in the resubmission. It includes:

1. Removal of Trees M8 and M16 from the existing tree inventory and indicate their previous locations as proposed Municipal replacement trees
2. Indicates Tree M6 as a removal at the rezoning stage, with acknowledgment of likely removal at future phases pending detailed design
3. Includes commitment to propose designs that facilitate hard surfaces above tree roots of protected trees, as outlined in the Arborist Report

4. BUILDING AND INSPECTION SERVICES COMMENTS

4.1.1 Staff Comment (Information):

The response letter indicates the overarching items, which are not addressed in this resubmission, will be addressed during the Development Permit application process. Kindly ensure that all outstanding items are comprehensively addressed at that time.

Applicant Response

Acknowledged. The School understands that items such as exit strategy, spatial separation, and exposure protection calculations will be addressed comprehensively at the Development Permit stage. The Architect will work closely with Building and Inspection Services to ensure that all outstanding technical requirements are fully resolved when detailed design is advanced.

5. FIRE DEPARTMENT COMMENTS

5.1.1 Staff Comment (Information):

You will be required to install BDA's (bi-directional amplifiers). During the design process you should plan on providing space for signal boosters. You will be notified by staff if any other requirements arise. Further design refinement will be required for the fire lane site entry point as the required turning radius of the vehicle currently will be traversing curbs. The entrance must be widened and consideration to shorter rolling curbs where necessary. Consider engaging an approved contractors that provides this equipment in our area.

Applicant Response

Acknowledged.