

Hillside Quadra Neighbourhood Action Committee

Via email to: mangrove@victoria.ca and mayorandcouncil@victoria.ca

December 29, 2017

Mayor and Council,
Michael Angrove, Planner
City of Victoria
1 Centennial Square
Victoria, BC
Re: Folder DPV00043 2708 Graham Street and 1050-1054 Hillside Avenue

Dear Mayor and Council:

The Neighbourhood Action Committee would like to offer the following comments based on the plans dated received November 15, 2017.

Prior to specific comments it needs to be noted that the development tracker tool on the city's web site in no way assisted the assessment of the application and interpretation of the specific zone, the Zoning Bylaw, the Official Community Plan, or the applicable Development Permit Guidelines. At a minimum, a table of requirements (based on a written interpretation), requested variances and resulting differences, better than the one provided below, needs to be provided for lay people to understand and intelligently comment on the application. In addition, there at least needs to be hyperlinks to all pertinent bylaw sections and guidelines and preferably a guideline checklist.

The committee requests to clarify the question of density. A density requirement can't be varied, so why can the number of buildings per lot, a density measure, be the subject of a variance? With respect to Floor Area Ratio (FSR), the zone permits an increasing FSR per building storey, and increases FSR provisions with an enclosed parking space—one that is **entirely within** the structure. The proposed below grade parking labelled "carport" is open on two sides, so it is not entirely within the structure.

To determine FSR by building storey, one must note that the Zoning Bylaw definition of "storey" does not include vehicle parking. Units 1 – 3 are two-storey units and unit 4 is a four-storey unit, so is the FSR required 0.6 or 0.9? Is there a provision to determine FSR in cases such as this, or is the building determined to have two storeys because $\frac{3}{4}$ of the building has two storeys, or three storeys because $\frac{1}{4}$ of the building footprint has three storeys? **This needs to be spelled out by the applicant and the staff interpretation of the bylaw in the development tracker, as this would need to be done prior to acceptance of the application.** The applicant calculation of FSR is 0.8 which may or may not exceed the permitted density. In addition, it needs to be noted that unit 4 has a basement floor which includes two full bathrooms and two separate outside entrances, typical of a secondary suite conversion.

If the use and density for this proposal are considered as conforming to the zone, then the following comments pertain to requirements for a multiple dwelling with an under-building carport, not enclosed parking. The plans refer to a landscape plan which is not available on the development tracker, so further review of the application is needed.

Proposed new building in the R3 – 2 Zone

FSR required: 0.6 – 2 storeys, 0.9 – 3 storeys; requested 0.8

No.	Variances	Requirement	Request	Difference
1	Number of buildings (density?)	1/lot	2	1
2	Site area,	920 m ²	911.93 m ²	8.07 m ²
	Open site space	30%	38.8%	8.8%
3	TH setbacks, street (East), North non-conforming	7.5m	2.42m	5.08m
	TH setbacks, rear (South)		2.31	
	Setbacks, interior side (W)		4.03, 5.04	
	Building separation		3.51	
4	Site coverage	30%	48.4%	18.4%
5	Parking for vehicles and	9 (1.5 x 6 units?)	6	3?
6	Bicycle requirements.	1/unit + 6 sp rack	6, 6 sp rack?	6 sp rack?

The committee agrees in general that attached dwellings in this context between apartment buildings and single houses can be appropriate. The width, size, siting and design of the proposed attached dwellings, shoehorned into consolidated lot at the rear of an existing duplex, does not fit the context. If proposed prior to duplex renovations a few years ago, it might have been reasonable to replace the existing buildings with one or more new buildings which could better respond to the site conditions. It is reasonable to retain the duplex because it provides good recently renovated affordable housing for families with children. Children and most humans need usable open space adjacent to dwellings, particularly ground-oriented dwellings. This open space is replaced by the parking access driveway.

As noted above, the proposal is shoehorned into the site, falling below the minimum site area and required yard setbacks, and exceeding the maximum site coverage. The lack of a landscape plan makes it difficult to determine if the open space is usable by residents.

There are several reasons why the proposed multiple/ attached unit building does not fit into the neighbourhood. Development Permit Area 16: Design Guidelines For: Multi-Unit Residential, Commercial and Industrial areas applies, and largely addresses the characteristics of a good fit. The approximately 100 applicable guidelines are divided into 10 sections. The applicant's letter does not mention any design related to following guidelines.

1.0 Context and Transition. The missing-middle transition of the built form from apartment to single house that proposal attempts to fill, does not reflect design or function of the single house neighbours in terms of usable open space and materials used. The transition of scale is uneven from duplex to attached to single house forms. Privacy at the south could be maintained even if parking access was moved south and the duplex open space largely retained. A combination of screening and collaborating with the southern neighbour in driveway design could do the trick.

2.0 Streetscape and Street Orientation. The proposal does have ground-oriented pedestrian only front entrances like most neighbourhood houses. The setback difference between the attached housing proposed and the existing single houses is significant, so it does not follow the guidelines. More horse chestnut trees are needed for a green transition.

- 3.0 Human Scale, Massing and Height. The proposal is built at a human scale. Treatment of 'back-of-house' functions such as parking, recycling and utility boxes is unclear. The porches are minimal, provide a poor transition between public and private spaces, and there are no sheltering overhangs.
- 4.0 Exterior Finishes. The proposed brick and stucco facing reflects few if any nearby houses..The building design is basic and unremarkable.
- 5.0 Open Spaces and Landscaping. Due to the lack of a landscape plan, there is no way to determine if there is any usable private open space. The usable private open space for the duplex (child-friendly housing) has been eliminated. Native species and multiple horse chestnut street trees would help make a good fit.
- 6.0 Lighting. There is no indication of lighting. Energy efficient full cut-off lights to minimize light pollution would be neighbor-friendly.
- 7.0 Universal Design and Safety. There is no indication that any of the units are accessible for people with any disability or that crime prevention has been taken into account.
- 8.0 Parking. Under-building vehicle parking and bicycle storage is noted, but no design details are provided for comment.
- 9.0 Access and Circulation. It is unclear what function or utility the rear attached housing stairs provide.
- 10.0 Loading, Service and Unenclosed Storage. It is unclear if this is applicable.

Sincerely,

Hillside-Quadra Neighbourhood Action Committee.