



## Planning and Land Use Committee Report

For the meeting of October 2, 2014

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**To:** Planning and Land Use Committee **Date:** September 18, 2014  
**From:** Lucina Baryluk, Senior Process Planner  
**Subject:** **Official Community Plan Amendment, Rezoning Application #00446 and Development Permit Application #000365 for 2328 Richmond Road** - Application to change the Urban Place Designation within the *Official Community Plan* and to rezone the subject property to permit a 12-unit residential development

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### Executive Summary

The purpose of this report is to present Council with information, analysis and recommendations regarding an *Official Community Plan* Amendment, Rezoning Application and Development Permit Application for the property located at 2328 Richmond Road. The proposal is to allow a 12 unit residential development.

The following factors were considered in reviewing this application:

- The proposal, with a 1.15:1 FSR, exceeds the maximum density (1:1 FSR) anticipated within the *Official Community Plan* (OCP) policies relating to Traditional Residential Urban Place Designation.
- In order to achieve a higher density, a change in the Urban Place Designation from Traditional Residential to another designation (Large Urban Village or Urban Residential) is required. The site is approximately 400 m from Jubilee Village, which is designated as a Large Urban Village in the OCP. To change the Urban Place designation for one isolated property is not consistent with the OCP, which considers land use patterns on a more comprehensive basis for orderly development.
- The relatively large building mass does not fit well with the immediate context of lower density housing.
- Development of this parcel alone isolates the corner parcel to the north so a more comprehensive redevelopment of this strategic corner would be precluded.
- The proposal includes only one short-term parking stall. This lack of on-site parking does not support the functionality of this building for the potential residents and will further contribute to the overspill parking issues within the Jubilee neighbourhood.

Staff recommend that Committee decline this application. Should the Committee wish to advance this application, an alternative recommendation is provided in the final section of this report.

## Recommendation

That Council consider declining this *Official Community Plan* Amendment and Rezoning Application #00446 for 2328 Richmond Road.

Respectfully submitted,

Lucina Baryluk  
Senior Process Planner  
Development Services

Deb Day, Director  
Sustainable Planning and  
Community Development

Report accepted and recommended by the City Manager: \_\_\_\_\_

Jason Johnson

Date: \_\_\_\_\_

Sept. 25/14

LB:af

S:\TEMPEST\_ATTACHMENTS\PROSPERO\PL\REZ\REZ00446\PLUC 2328 RICHMOND.DOC

## **1.0 Purpose**

The purpose of this report is to present Council with information, analysis and recommendations regarding an *Official Community Plan* Amendment, Rezoning Application and Development Permit Application for the property located at 2328 Richmond Road. The proposal is to allow a 12 unit residential development.

## **2.0 Background**

### **2.1 Description of Proposal**

The proposal is for a three-storey building with 12 one-bedroom units. Each unit would have direct access to the exterior, with six units facing Richmond Road and six units facing the rear property line.

Two parking stalls, in a stacked layout, are proposed for short-term parking. Schedule C requirements do not allow stacked or tandem parking stalls; therefore, only one parking stall meets the requirements of Schedule C. Bicycle parking would be provided in compliance with the Schedule C requirements of the *Zoning Regulation Bylaw*.

### **2.2 Sustainability Features**

With respect to green features, the developer has indicated that no specific rating system will be used; however, best practices with respect to durability of materials, energy efficiency, water conservation, construction waste management and low toxic materials will be applied.

### **2.3 Existing Site Development and Development Potential**

A single family dwelling, constructed in 1955, currently occupies the property. This dwelling would be removed.

The current zoning of the subject property is R1-B, Single Family Dwelling District, and would allow construction of a dwelling unit with a secondary suite, with a combined total floor area of 300 m<sup>2</sup>.

### **2.4 Improvements to the Transportation Network**

The subject property is located near a critical intersection. Both Richmond Road and Bay Street are classified as secondary arterials. Richmond Road is substandard in width which creates a challenge in terms of accommodating future transportation needs for improvements to bus lanes, bike lanes, sidewalks and boulevard placement. To accommodate these needs, the City would secure a 3.41 m Statutory Right-of-Way on Richmond Road as a condition of rezoning.

### **2.5 Land Use Context**

The Royal Jubilee Hospital is directly across Richmond Road from the subject parcel. The west side of Richmond Road, between Bay Street and Denman Street, is generally comprised of single family dwellings. Further south along Richmond Road, there is a transition to multiple dwelling units and office use.



## 2.6 Data Table

The following data table compares the proposal to a five-unit residential development located at 2116 Richmond Road. This multi-unit residential development has been chosen as comparable since it is a similar size of lot to that on Richmond Road. An asterisk is used to identify where the proposal is less stringent from the comparative zone.

Zoning Criteria	Proposal	Richmond Apartment District (R1-10)
Site area (m <sup>2</sup> ) - minimum	502.51*	560.00
Total floor area (m <sup>2</sup> ) - maximum	581.01	n/a
Density (Floor Space Ratio) - maximum	1.15:1*	0.65:1
Storeys - maximum	3	3
Height (m) - maximum	9.80*	9.00
Site coverage (%) - maximum	49*	25
Open site space (%) - minimum	42	40
Setbacks (m) - minimum		
Front - Richmond	3.41*	6.00
Rear	1.73*	13.00
Side - South	3.80	1.5
Side - North	1.20*	3.6
Bicycle storage (Class 1) - minimum	12	12
Bicycle rack (Class 2) - minimum	6 space bike rack	6 space bike rack
Vehicular parking – minimum	None* Schedule C requires 17 spaces	5 provided Schedule C requires 7 spaces
Visitor parking /short term parking stalls – 10 % of total number of parking stalls	1* (tandem stall providing 2 short-term visitor parking stalls; however, stall layout does not meet Schedule C requirements and only qualifies as 1 stall)	1 (in compliance with Schedule C for number of parking stalls provided)

## 2.7 City Policy

### 2.7.1 Official Community Plan, 2012

The *Official Community Plan* (OCP) sets out a vision for the Jubilee Neighbourhood in the City-wide context. The OCP identifies the subject lands within the Traditional Residential



designation which envisions a maximum density of up to 1:1 FSR, with the corresponding Built Form consisting of multi-unit buildings up to three storeys, including attached residential and apartments on arterial and secondary arterial roads.

The applicant is indicating that the Development Permit guidelines applicable to a Large Urban Village would be applicable to the project. However, the design guidelines cited within the Large Urban Village do not provide sufficient guidance for a multi-unit residential development, and as such, staff is recommending that the Design Guidelines for Multi-Unit Residential, Commercial and Industrial (2012) would provide more specific guidance. If Council wishes to advance this application, a more comprehensive review of the design would be undertaken and a report on the Development Permit Application would be presented to Council.

## **2.7.2 Jubilee Neighbourhood Plan**

The *Jubilee Neighbourhood Plan* (1996) places the subject property in a category of maintaining the current zoning.

## **2.8 Community Consultation**

The North Jubilee Neighbourhood Association (CALUC) hosted a Community Meeting regarding this application on March 26, 2014. The attached record provides details of this discussion. Since that time, the applicant has refined the development, the details of which are captured in the applicant's letter. Consistent with the normal process, updated plans have been sent to the CALUC and the CALUC has provided updated comments on the proposal (attached).

## **3.0 Issues**

The following are the key issues associated with this application:

- *Official Community Plan* Amendment, density and context
- land assembly
- parking variance.

## **4.0 Analysis**

### **4.1 *Official Community Plan* Amendment, Density and Context**

The OCP, which was informed by community input, provides comprehensive long-term guidance on land management and development. The Urban Place Guidelines set out designations as well as descriptions related to built form, place character features, uses and density (Figure 8). As noted, the subject property is within the Traditional Residential designation. The upper limit for density considered within the OCP for properties within a Traditional Residential designation is an FSR of 1:1. The built form outlined in the Traditional Residential is detailed as "multi-unit buildings up to three storeys, including attached residential and apartments on arterial and secondary arterial roads". While the built form of the project is within the scope of the Traditional Residential designation, the proposed density of 1.15:1 FSR exceeds the density provision.

The applicant's letter suggests that the subject property is adjacent to a Large Urban Village. For clarity, for development permit purposes only, the adjacent property (the Royal Jubilee Hospital) has been included in Development Permit Area 5, Large Urban Villages. However, the designation (which sets out use and density) for the Royal Jubilee Hospital is General Employment (Map 2 – Urban Place Designations). The applicant's request is to include the property in the Jubilee Large Urban Village Designation, which is actually 400 m to the south, and would create a parcel that is isolated from the Village area. Should this application proceed, it would be more appropriate to consider a change to an Urban Residential Designation, which allows densities up to 1.2:1 FSR, and the uses are limited to residential uses or mixed-use along arterials; however, this designation would be somewhat more suited to the local context, but still not in consistent with policy for the area. The policies for a Large Urban Village would provide for a higher density of up to 1.5:1 FSR and also a broader range of uses, including commercial. However, the actual zone may include more restrictive provisions.

The OCP does provide direction for the consideration of increasing density within the Traditional Residential designation. The OCP states the following:

*For areas designated Traditional Residential, consider new development, infill, and redevelopment consistent with the density and use ranges established in this plan, permitting their increase only as this plan provides or following the completion of a new local area plan for the area and the subsequent amendment of this plan to give it effect. (Policy 6.22)*

While changes to the OCP designation to allow for a type of development or density not anticipated by the OCP are possible, to contemplate changes on a parcel-by-parcel basis is contrary to the principles of the OCP that considers land use patterns on a more comprehensive basis for orderly development. Without the benefit of an updated local area plan that would examine options for change along Richmond Road or changes to the boundaries of the Jubilee Village, the change to the Urban Place Designation to capture higher density is not recommended by staff. In this context, the Traditional Residential designation provides adequate latitude for redevelopment of the subject parcel in a manner that is in keeping with the anticipated land use patterns for the neighbourhood.

It is noted that if an *Official Community Plan* amendment is required, there are certain administrative requirements, which are captured in the Alternative Recommendation.

## **4.2 Land Assembly**

In Section 6, *Land Development and Management*, the OCP encourages the logical assembly of development sites that enable the best realization of permitted development potential for the area (Policy 6.8). A significant concern is "orphaning" the property located at 2330 Richmond Road. Due to the issues with access on this property, redevelopment may be challenging. By consolidating 2330 and 2328 Richmond Road, a more logical redevelopment can occur with a comprehensive approach to access and parking.



### 4.3 Parking Variance

The required parking for a 12-unit multiple residential development would be 17 stalls at 1.4 stalls per unit (Schedule C requirement). Generally, a parking ratio of one stall per unit is acceptable for a one-bedroom unit. It is anticipated that further reductions in the parking ratio would need to be justified with a Transportation Demand Management Study; however, in this case, the applicant did not provide this additional information. In any event, it would be difficult for staff to recommend that Council support a parking variance of this magnitude.

There are two main issues related to the shortfall in parking:

- In order to support the functionality of a residential development, some off-street parking is necessary for residents who own cars, for visitors and for deliveries. By not providing any parking, the alternative is for residents to use on-street parking. On-street parking on this block of Richmond is not available due to transit and bike lanes. The occupiers of this project could not use "resident parking only" located in other areas, as these are restricted to residents of a specified block.
- The Jubilee neighbourhood is sensitive to the parking demands generated by the Royal Jubilee Hospital. Developers are strongly encouraged to meet their parking demands on-site in this neighbourhood. The Jubilee Neighbourhood Plan contains the following Housing Objective: Ensure new residential developments provide sufficient parking to meet their needs.

Given the degree of the parking shortfall proposed, the scarcity of on-street parking in the area and the relevant policy, staff do not recommend Council consider the requested variance. The applicant is indicating that each unit will be provided a share in the Victoria Car Share Co-op. If this application advances, this will be a requirement. While this measure was not seen as resolving the shortfall in parking, staff recommend that Council direct the applicant to enter into a Car Share agreement.

### 5.0 Resource Impacts

Resource impacts may include an increase to the number of parking infractions within the "Resident Parking Only" areas of the Jubilee Neighbourhood.

### 6.0 Conclusions

The 12 unit residential building represents a building form and unit type that would add to the diversity of housing within the City of Victoria. While the project has merits, the amount of building for the site and the lack of functionality for the potential residents as well as the impact on the neighbourhood outweigh the positive aspects. The proposed density is above the density anticipated within the Traditional Residential designation. To change the Urban Place designation for one isolated property is not in keeping with the spirit of the *Official Community Plan*, which considers land use patterns on a more comprehensive basis for orderly development.



## 7.0 Alternative Recommendation

### 7.1 Alternative Recommendation (advance the application)

1. a. That Council instruct City Staff to prepare the necessary *Official Community Plan* amendment bylaw to remove the property located at 2328 Richmond Road from the Traditional Residential Urban Place Designation and place the subject property within the Urban Residential Urban Place Designation and subject to the requirements of Development Permit Area 16: General Form and Character:
  - b. That Council consider giving first reading to the *Official Community Plan* amendment bylaw.
2. That Council consider the *Official Community Plan* amendment bylaw in conjunction with the *City of Victoria 2012-2016 Financial Plan* and the *Capital Regional District Liquid Waste Management Plan* and *Capital Regional District Solid Waste Management Plan* pursuant to section 882(3)(a) of the *Local Government Act* and deem those plans to be consistent with the proposed *Official Community Plan Amendment Bylaw*.
  - a. That Council consider consultation under section 879(2) of the *Local Government Act* and determine that no referrals are necessary with the Capital Regional District Board; Councils of Oak Bay, Esquimalt and Saanich; the Songhees and Esquimalt First Nations; the School District Board; and the provincial and federal governments and their agencies because of the nature of the proposed amendments.
  - b. That Council consider giving second reading to the *Official Community Plan* amendment bylaw.
3. That Council refer the *Official Community Plan* amendment bylaw for consideration at a Public Hearing.
4. That Council instruct City Staff to prepare the necessary *Zoning Regulation Bylaw* amendment that would authorize the proposed development outlined in Rezoning Application #00446 for 2328 Richmond Road and advance it to a Public Hearing, subject to:
  - a. Registration of a Statutory Right-of-Way of 3.41 m on Richmond Road to the satisfaction of the Director of Engineering and Public Works;
  - b. The applicant providing confirmation of participation in Victoria Car Share to the satisfaction of the City Solicitor;
  - c. If the sewage discharge rates determine that some form of sewage attenuation is required, the registration of a Section 219 covenant will be necessary to secure the commitment to attenuate sewage;
  - d. Review of the development permit application for compliance with the Design Guidelines for Multi-Unit Residential, Commercial and Industrial and a report provided to Council.

## 8.0 List of Attachments

- Aerial Map
- Zoning Map
- *Official Community Plan*, Map 27, Jubilee Strategic Directions
- Plans dated August 20, 2014
- Letter from applicant dated April 17, 2014 and August 20, 2014
- North Jubilee Neighbourhood Association, letter dated April 17, 2014 and May 23, 2014 (in response to plan changes).





2328 Richmond Road  
Rezoning #00446  
Bylaw #







2328 Richmond Road  
Rezoning #00446  
Bylaw #





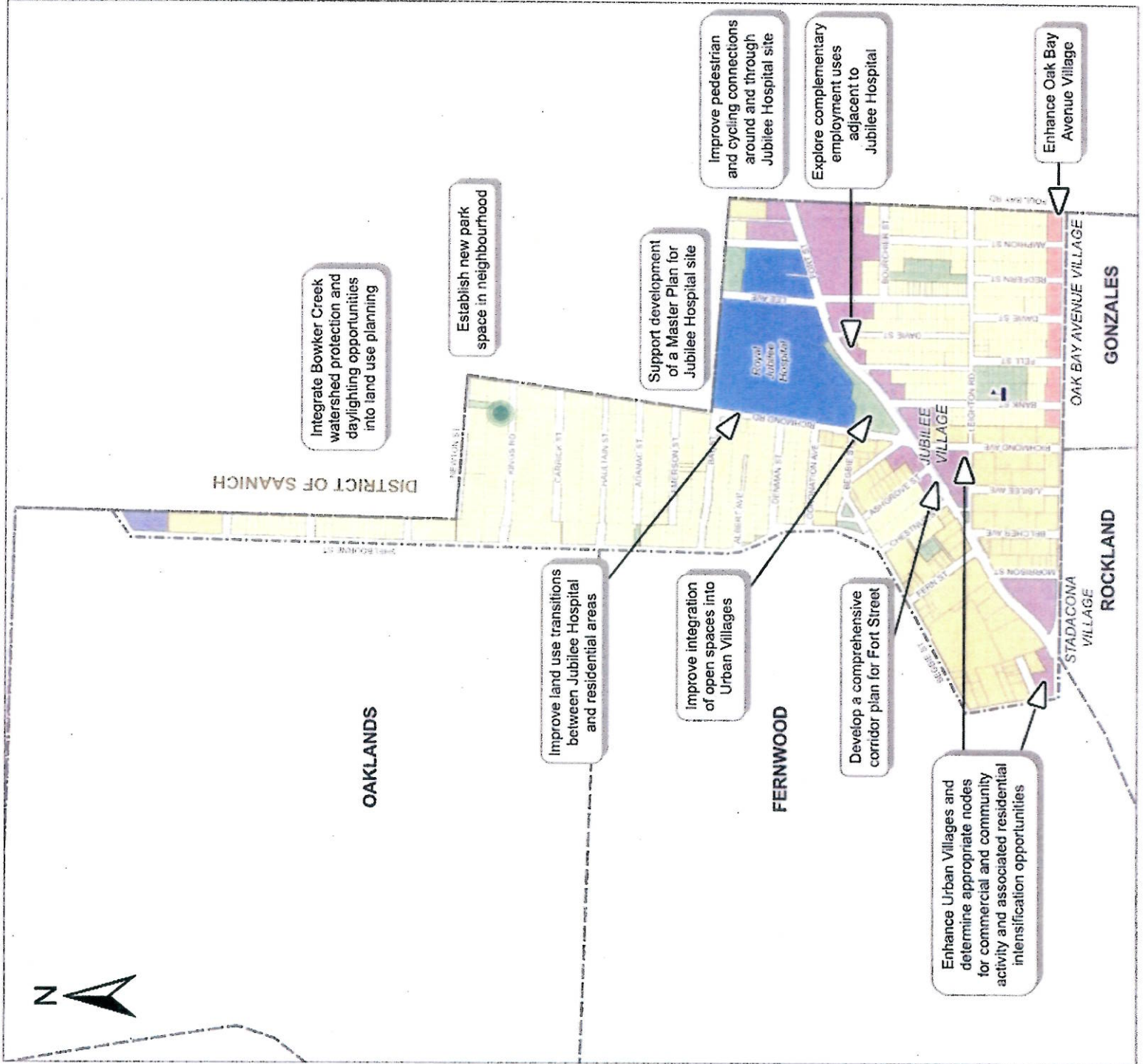
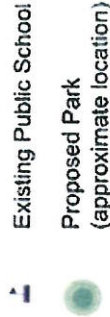
# MAP 27

## Jubilee Strategic Directions

### Urban Place Designations\*



### Public Facilities



\*Urban Place Designations are provided for information purposes only. Please refer to Map 2 and Figure 8 for designation information.

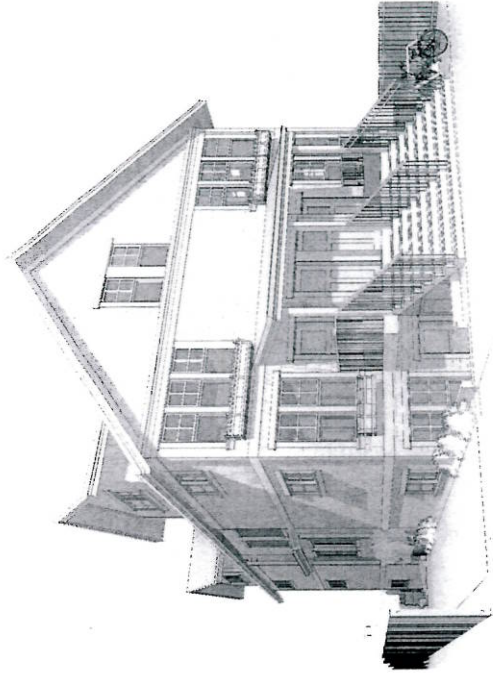
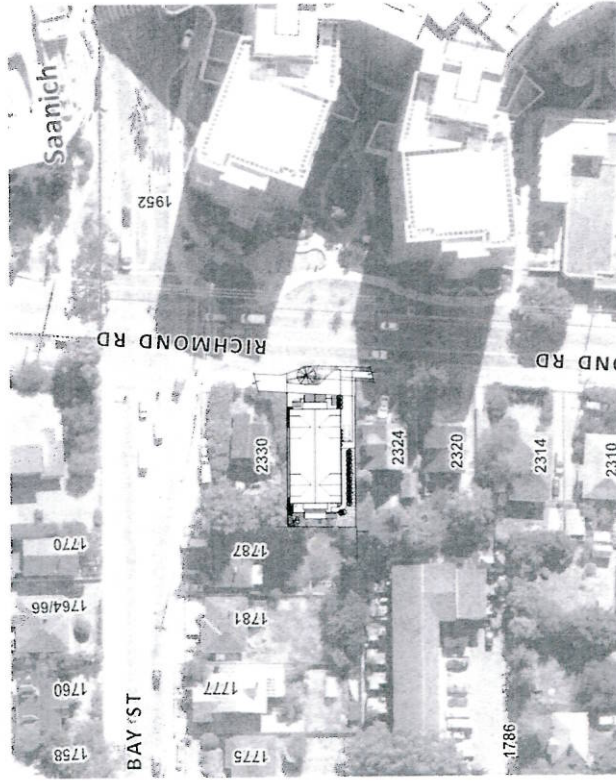
# Application for Official Community Plan Amendment, Rezoning & Development Permit

## 2328 Richmond Road

LEGAL DESCRIPTION: LOT 1, SECTION 7E, PLAN V911133  
LAND DISTRICT 57, RD # 407-872-885

**CONTACTS**

<b>APPLICANT &amp; CONSTRUCTION MANAGER</b>	<b>ARCHITECT</b>	<b>CIVIL ENGINEER</b>
JKO HOLDINGS 555 PIMPERNE STREET VICTORIA, BC V8T 3H5 250-479-6333 CONTACT: JOHN KEMPPEIT	CHRISTINE LINTOTT ARCHITECT 22-833 HERALD STREET VICTORIA, BC V8T 4T6 250-384-3869 CONTACT: CHRISTINE LINTOTT	HEROLD ENGINEERING 1001 VINCOWARD ST. VICTORIA, BC V8T 4T6 250-586-4875 CONTACT: SARAH CAMPBELL



1 View From South East

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**AUG 20 2014**  
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Development Services Division

2328 Richmond Road

Victoria BC

Cover Sheet

Drawn By: CL  
Checked By: MF  
Scale: 1:500

A0.00



Site Plan Of:  
Lot 3, Section 76, Victoria District, Plan 1125,  
Except The North East Part.



Scale = 1:150

... of January, 2014.

Dated this 14th day of November 1941.

Distances and elevations shown are as indicated on the map and in OCM 15-10.

Pt. 4  
Plan 1125

Rem. 3  
Plan 1125

Man Floor: 24.25  
Elev: 26.39

© 2004 M&S Power

Utility Pole

Strata Plan  
VIS222

Parcel B  
Plan 1217

**RICHARD J. WEY & ASSOCIATES.**  
Land Surveying Inc.  
www.weysurveys.com  
2227 James White Boulevard  
Burnaby, BC V8L 1Z5  
Telephone (604) 656-9155  
Fax (604) 656-9345

1. Existing Survey Plan 1:100

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City of Victoria

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**Development Services Division**

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# REZONING PROJECT INFORMATION TABLE

REZONING	EXISTING ZONING
COMMERCIAL	COMMERCIAL
SITE AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
TOTAL FLOOR AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
CONCRETE FLOOR AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
FLOOR SPACE AND	10,000 M <sup>2</sup> (2,479 SQ. FT.)
OPEN SPACE	10,000 M <sup>2</sup> (2,479 SQ. FT.)
WEIGHT OF BUILDING	10,000 M <sup>2</sup> (2,479 SQ. FT.)
NUMBER OF STORIES	1

SITE AREA NOTED ABOVE INCLUDES THE ENTIRE BASE OF AREA AND HAS BEEN PROVIDED BY THE ARCHITECT AND ASSOCIATES

REZONING	EXISTING ZONING
COMMERCIAL	COMMERCIAL
SITE AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
TOTAL FLOOR AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
CONCRETE FLOOR AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
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OPEN SPACE	10,000 M <sup>2</sup> (2,479 SQ. FT.)
WEIGHT OF BUILDING	10,000 M <sup>2</sup> (2,479 SQ. FT.)
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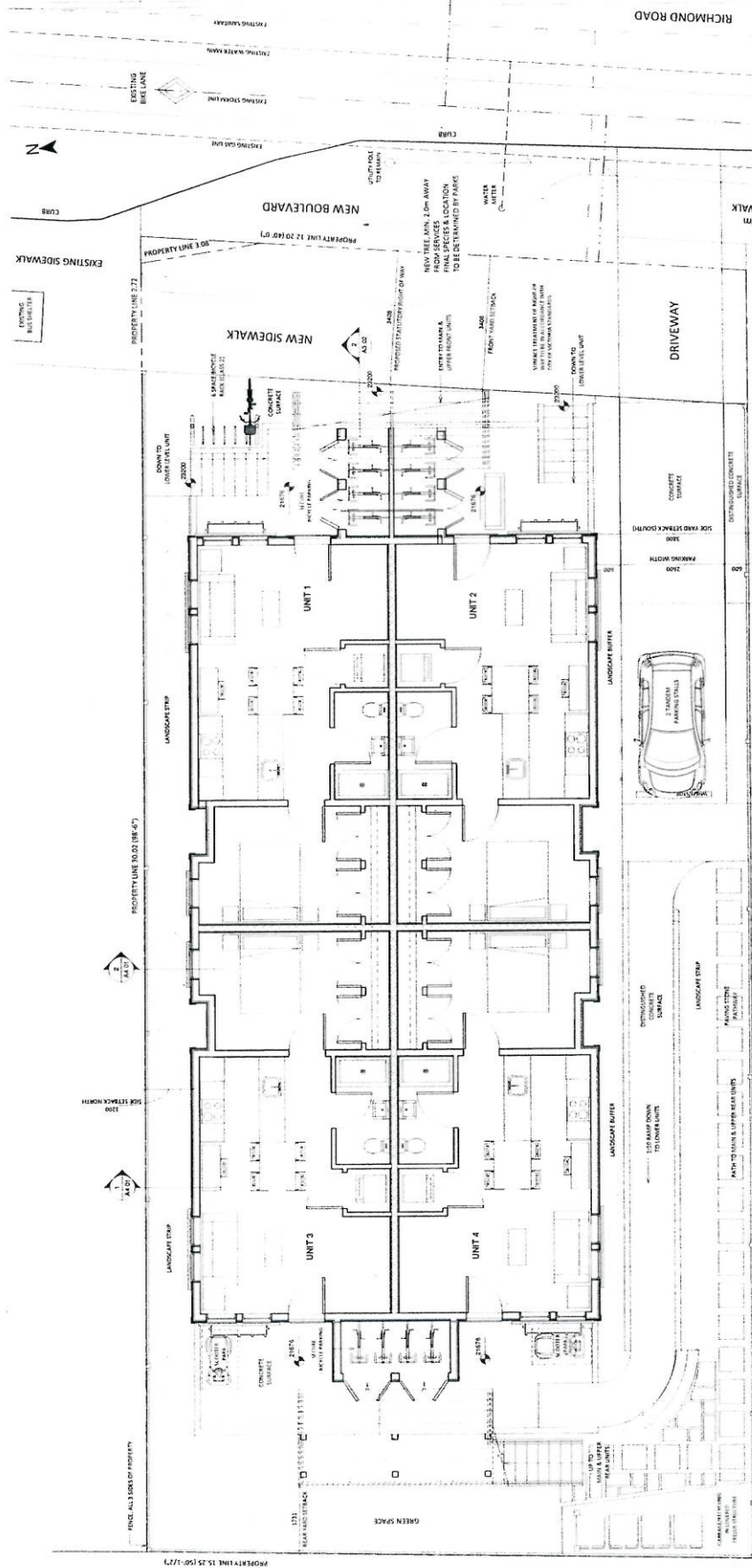
REZONING	EXISTING ZONING
COMMERCIAL	COMMERCIAL
SITE AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
TOTAL FLOOR AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
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NUMBER OF STORIES	1

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COMMERCIAL	COMMERCIAL
SITE AREA	10,000 M <sup>2</sup> (2,479 SQ. FT.)
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OPEN SPACE	10,000 M <sup>2</sup> (2,479 SQ. FT.)
WEIGHT OF BUILDING	10,000 M <sup>2</sup> (2,479 SQ. FT.)
NUMBER OF STORIES	1

CHRISTINE LINTOTT ARCHITECT

Issue Date  
2014  
August 10, 2014

Revision Date  
August 10, 2014



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EXISTING RICHMOND ROAD STREET VIEW



PROPOSED RICHMOND ROAD STREET VIEW

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THE GENERAL CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS.

Sheet: Date:  
COP Amendment: Revising April 24, 2014  
Development Permit

Revision: Date:  
Revising: Revising August 20, 2014

Consultant:

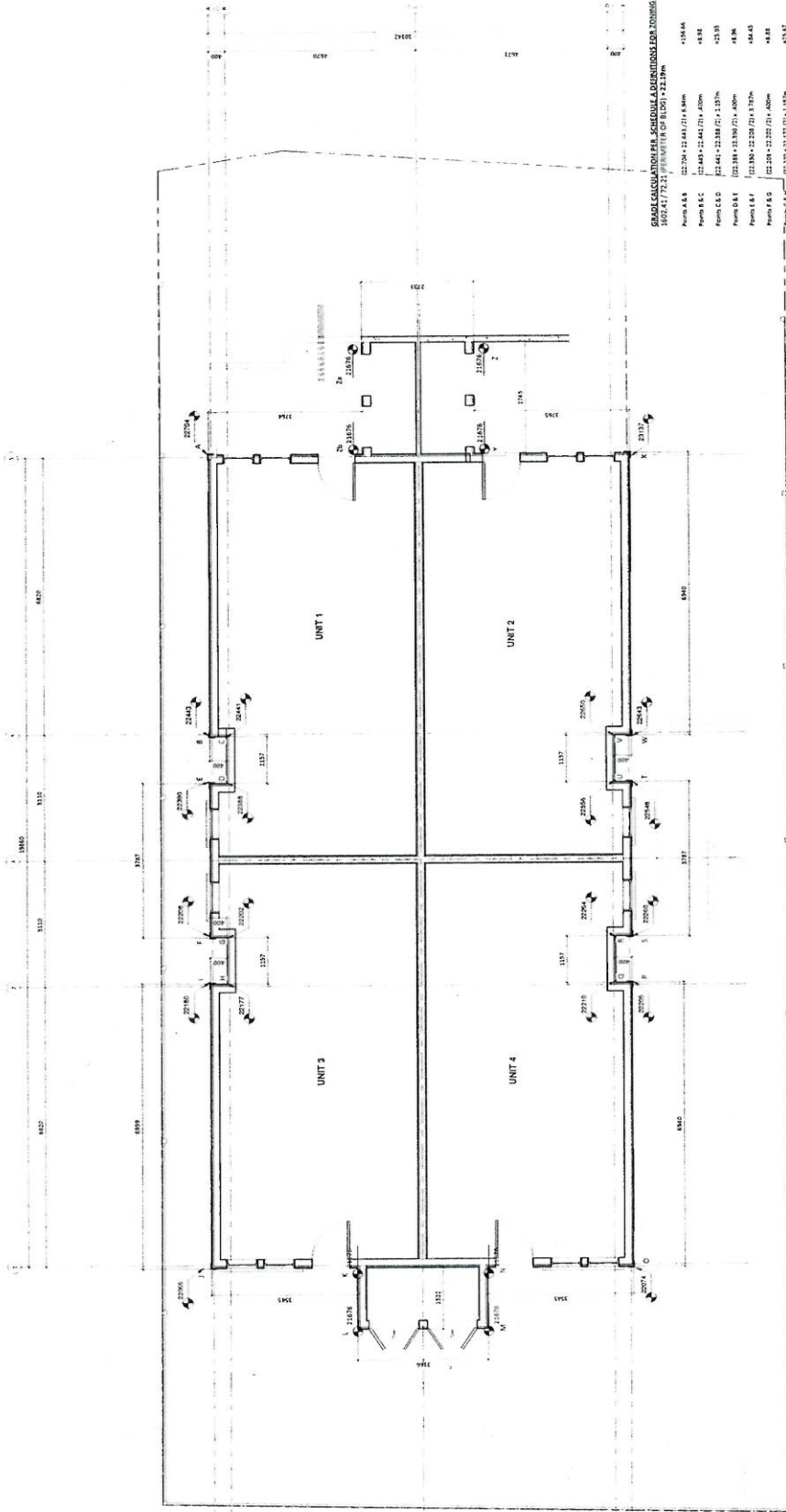
2328 Richmond Road  
Victoria, BC

Grade Calculations

Drawn by: MS  
Checked by: CL

A1.03

Scale:

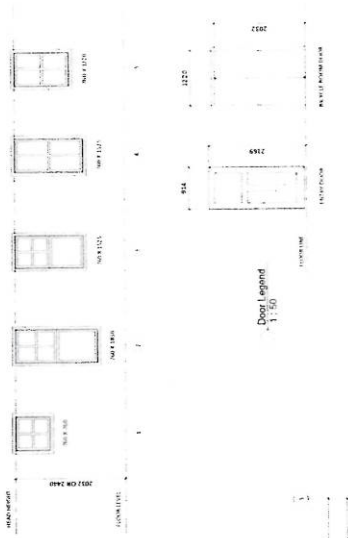


1- Grade Calculations  
1:50

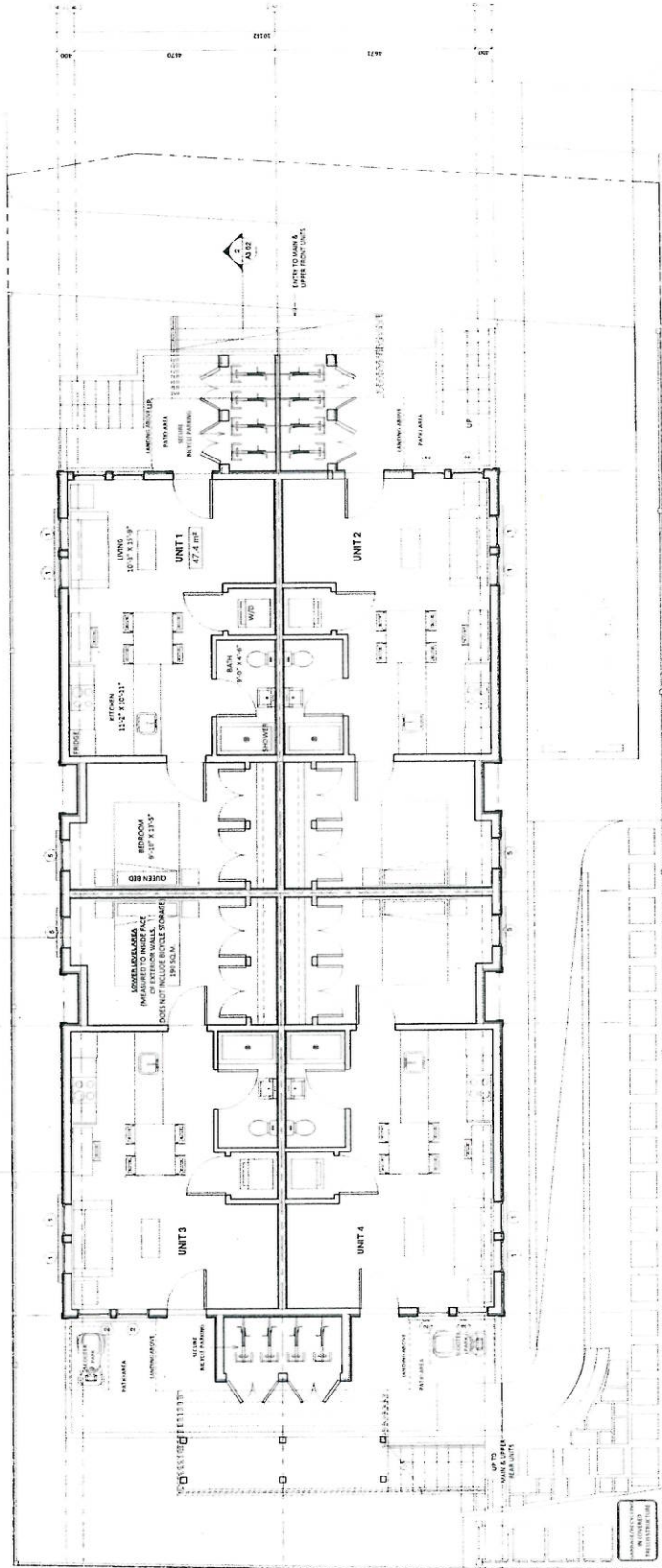
GRADE CALCULATION PER SCHEDULED DIMENSIONS FOR POINTS

1002.41/72.2 (21' x 6.00m) or BLOI = 22.97m		
Points A & B	122.304 + 22.443 (21' x 6.00m)	+116.64
Points B & C	122.443 + 22.443 (21' x 6.00m)	+118.69
Points C & D	122.443 + 22.388 (21' x 5.10m)	+114.83
Points D & E	122.388 + 22.390 (21' x 6.00m)	+114.78
Points E & F	122.390 + 22.328 (21' x 5.10m)	+114.72
Points F & G	122.328 + 22.322 (21' x 6.00m)	+114.65
Points G & H	122.322 + 22.322 (21' x 5.10m)	+114.57
Points H & I	122.322 + 22.322 (21' x 6.00m)	+114.49
Points I & J	122.322 + 22.322 (21' x 5.10m)	+114.41
Points J & K	122.322 + 22.322 (21' x 6.00m)	+114.33
Points K & L	122.322 + 22.322 (21' x 5.10m)	+114.25
Points L & M	122.322 + 22.322 (21' x 6.00m)	+114.17
Points M & N	122.322 + 22.322 (21' x 5.10m)	+114.09
Points N & O	122.322 + 22.322 (21' x 6.00m)	+114.01
Points O & P	122.322 + 22.322 (21' x 5.10m)	+113.93
Points P & Q	122.322 + 22.322 (21' x 6.00m)	+113.85
Points Q & R	122.322 + 22.322 (21' x 5.10m)	+113.77
Points R & S	122.322 + 22.322 (21' x 6.00m)	+113.69
Points S & T	122.322 + 22.322 (21' x 5.10m)	+113.61
Points T & U	122.322 + 22.322 (21' x 6.00m)	+113.53
Points U & V	122.322 + 22.322 (21' x 5.10m)	+113.45
Points V & W	122.322 + 22.322 (21' x 6.00m)	+113.37
Points W & X	122.322 + 22.322 (21' x 5.10m)	+113.29
Points X & Y	122.322 + 22.322 (21' x 6.00m)	+113.21
Points Y & Z	122.322 + 22.322 (21' x 5.10m)	+113.13
Points Z & AA	122.322 + 22.322 (21' x 6.00m)	+113.05
Points AA & AB	122.322 + 22.322 (21' x 5.10m)	+112.97
Points AB & AC	122.322 + 22.322 (21' x 6.00m)	+112.89
Points AC & AD	122.322 + 22.322 (21' x 5.10m)	+112.81
Points AD & AE	122.322 + 22.322 (21' x 6.00m)	+112.73
Points AE & AF	122.322 + 22.322 (21' x 5.10m)	+112.65
Points AF & AG	122.322 + 22.322 (21' x 6.00m)	+112.57
Points AG & AH	122.322 + 22.322 (21' x 5.10m)	+112.49
Points AH & AI	122.322 + 22.322 (21' x 6.00m)	+112.41
Points AI & AJ	122.322 + 22.322 (21' x 5.10m)	+112.33
Points AJ & AK	122.322 + 22.322 (21' x 6.00m)	+112.25
Points AK & AL	122.322 + 22.322 (21' x 5.10m)	+112.17
Points AL & AM	122.322 + 22.322 (21' x 6.00m)	+112.09
Points AM & AN	122.322 + 22.322 (21' x 5.10m)	+112.01
Points AN & AO	122.322 + 22.322 (21' x 6.00m)	+111.93
Points AO & AP	122.322 + 22.322 (21' x 5.10m)	+111.85
Points AP & AQ	122.322 + 22.322 (21' x 6.00m)	+111.77
Points AQ & AR	122.322 + 22.322 (21' x 5.10m)	+111.69
Points AR & AS	122.322 + 22.322 (21' x 6.00m)	+111.61
Points AS & AT	122.322 + 22.322 (21' x 5.10m)	+111.53
Points AT & AU	122.322 + 22.322 (21' x 6.00m)	+111.45
Points AU & AV	122.322 + 22.322 (21' x 5.10m)	+111.37
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Points AW & AX	122.322 + 22.322 (21' x 5.10m)	+111.21
Points AX & AY	122.322 + 22.322 (21' x 6.00m)	+111.13
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Points AZ & BA	122.322 + 22.322 (21' x 6.00m)	+110.97
Points BA & BB	122.322 + 22.322 (21' x 5.10m)	+110.89
Points BB & BC	122.322 + 22.322 (21' x 6.00m)	+110.81
Points BC & BD	122.322 + 22.322 (21' x 5.10m)	+110.73
Points BD & BE	122.322 + 22.322 (21' x 6.00m)	+110.65
Points BE & BF	122.322 + 22.322 (21' x 5.10m)	+110.57
Points BF & BG	122.322 + 22.322 (21' x 6.00m)	+110.49
Points BG & BH	122.322 + 22.322 (21' x 5.10m)	+110.41
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Points BM & BN	122.322 + 22.322 (21' x 5.10m)	+109.93
Points BN & BO	122.322 + 22.322 (21' x 6.00m)	+109.85
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Points BP & BQ	122.322 + 22.322 (21' x 6.00m)	+109.69
Points BQ & BR	122.322 + 22.322 (21' x 5.10m)	+109.61
Points BR & BS	122.322 + 22.322 (21' x 6.00m)	+109.53
Points BS & BT	122.322 + 22.322 (21' x 5.10m)	+109.45
Points BT & BU	122.322 + 22.322 (21' x 6.00m)	+109.37
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Points BV & BW	122.322 + 22.322 (21' x 6.00m)	+109.21
Points BW & BX	122.322 + 22.322 (21' x 5.10m)	+109.13
Points BX & BY	122.322 + 22.322 (21' x 6.00m)	+109.05
Points BY & BZ	122.322 + 22.322 (21' x 5.10m)	+108.97
Points BZ & CA	122.322 + 22.322 (21' x 6.00m)	+108.89
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Points CB & CC	122.322 + 22.322 (21' x 6.00m)	+108.73
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Points GG & HH	122.322 + 22.322 (21' x 6.00m)	+98.17
Points HH & II	122.322 + 22.322 (21' x 5.10m)	+98.09
Points II & JJ	122.322 + 22.322 (21' x 6.00m)	+98.01
Points JJ & KK	122.322 + 22.322 (21' x 5.10m)	+97.93
Points KK & LL	122.322 + 22.322 (21' x 6.00m)	+97.85
Points LL & MM	122.322 + 22.	





Door Legend  
1:50



1 Lower Level Floor Plan  
1:50

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Development Services Division

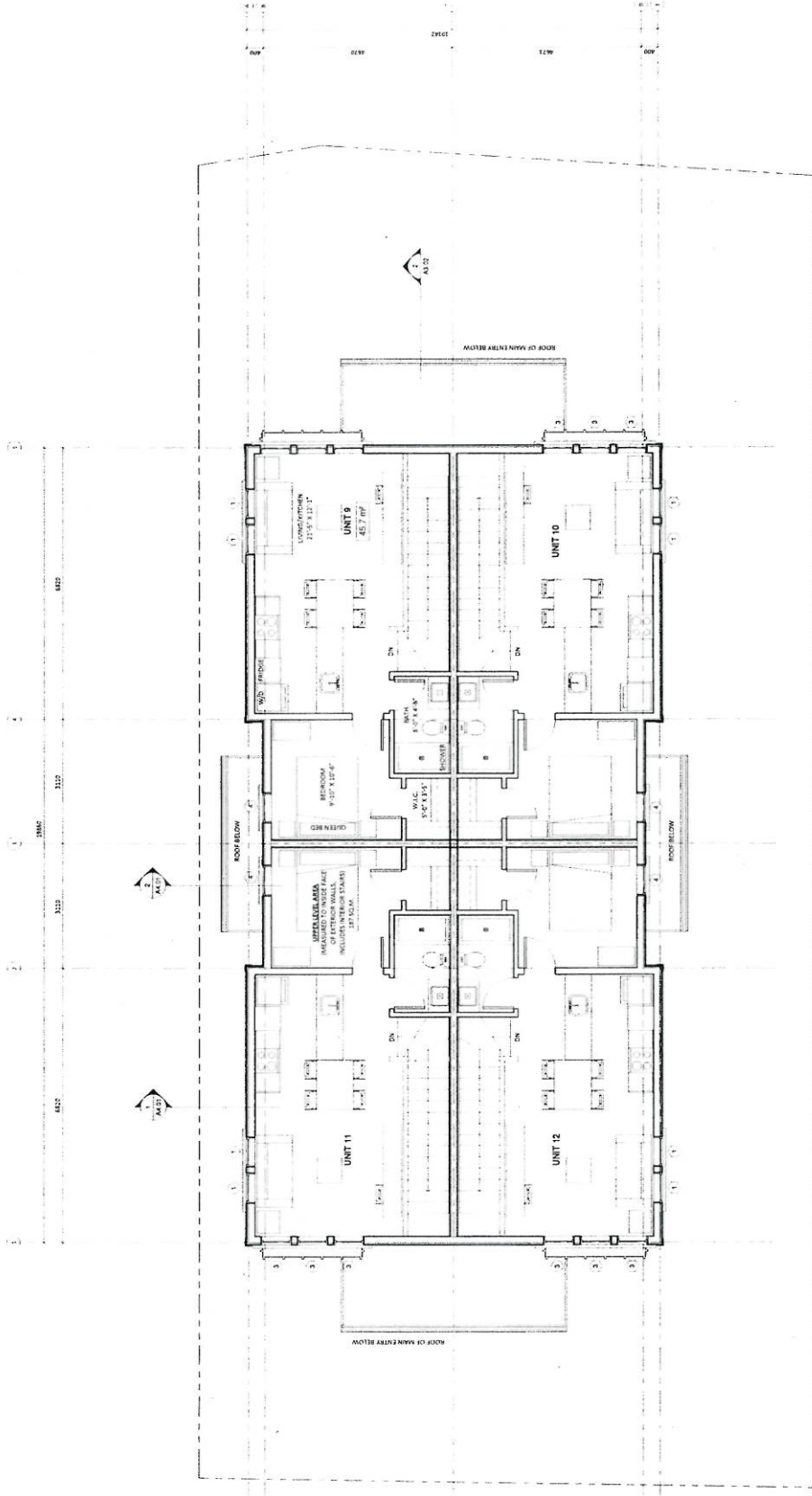
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Upper Level Floor Plan  
1/50

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CHRISTINE  
LINTOTT  
ARCHITECT



Issue  
Date  
CDA Amendment, Reopening  
& Development Permit  
April 23, 2014

Revision  
Reopening Re-submission  
August 20, 2014

Consultant

2328 Richmond Road

Victoria BC

Roof Plan

Drawn by  
Checked by

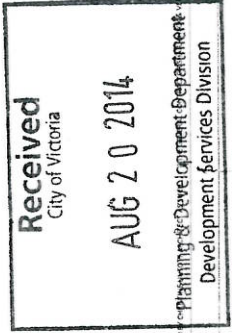
1/4  
1/2

A2.04

Scale

1:50

1 - Roof Plan  
1:50



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Issue: Date:  
CDD Application, Permitting & Development Permit April 24, 2014

Revision: Date:  
Resolving Municipality August 23, 2014

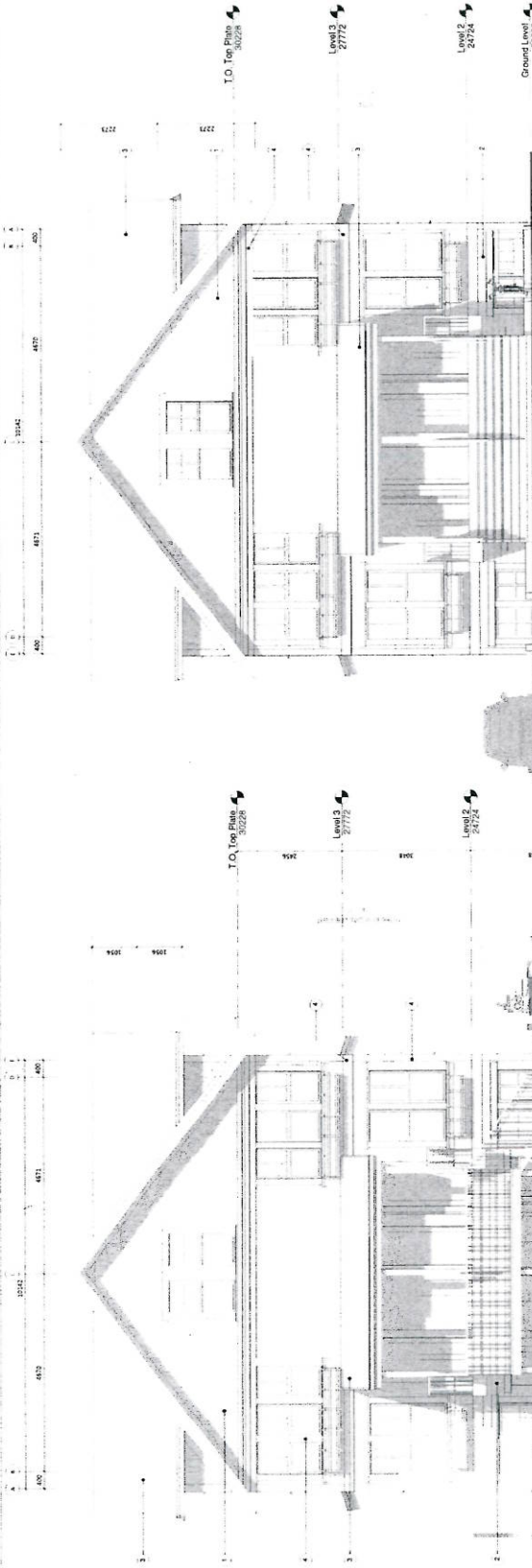
Consultant:

2328 Richmond Road  
Victoria, BC

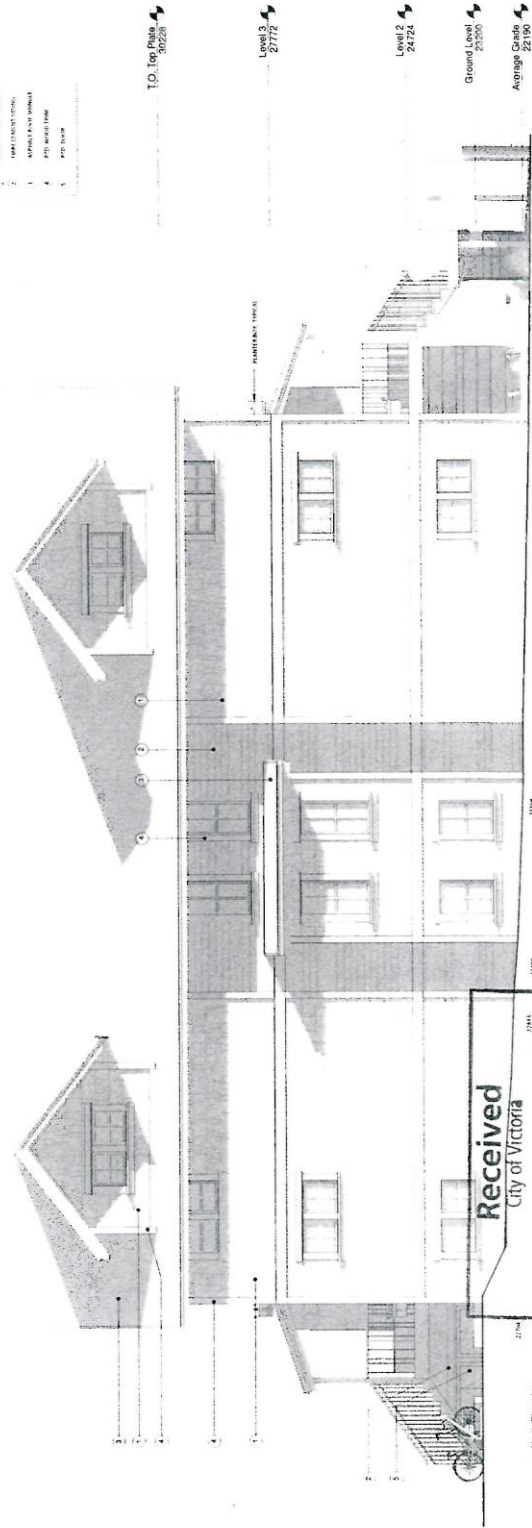
Exterior Elevations

Drawn By: Checked By: Scale: 1:50

A3.01



2 - West Elevation  
1:50



3 - North Elevation  
1:50

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EXISTING MATERIALS:  
1. EXISTING CONCRETE  
2. EXISTING BRICK  
3. EXISTING ROOFING  
4. EXISTING PAINT  
5. EXISTING FLOORING  
6. EXISTING STAIRS

T.O. Top Plate  
30228

Level 3  
27772

Level 2  
24724

Ground Level  
20200

Average Grade  
21180

South Elevation  
1:50

T.O. Top Plate  
30228

Level 3  
27772

Level 2  
24724

Ground Level  
20200

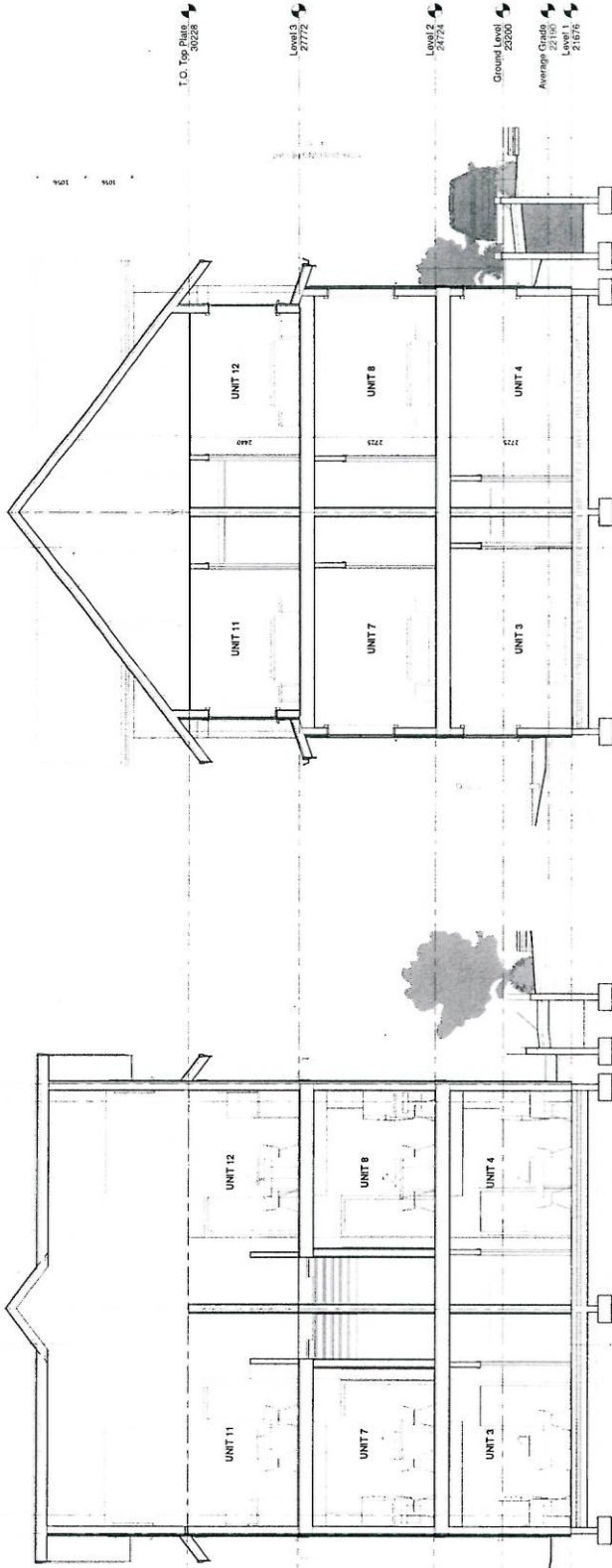
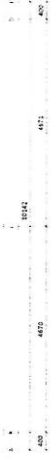
Level 1  
21676

Logarithmic Section  
1:50

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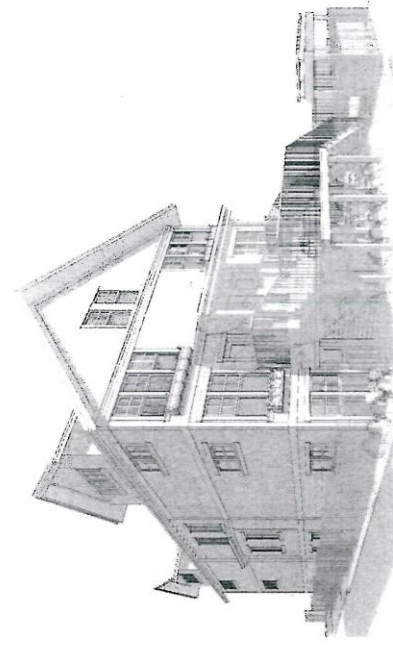




1 Section Between GL's 1&2  
1:50

2 Section Between GL's 2&3  
1:50

Consultant



3 View from North West

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2328 Richmond Road  
Victoria, BC

Building Sections

Drawn By  
Checked By  
VP  
CL

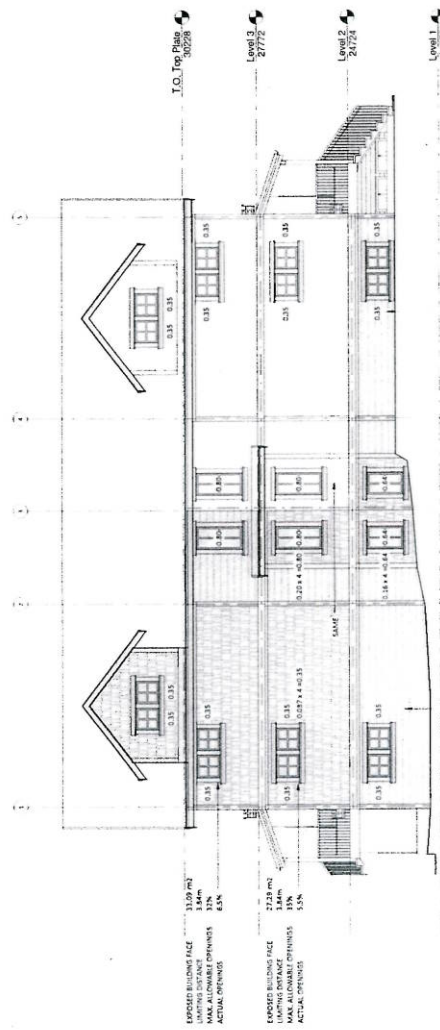
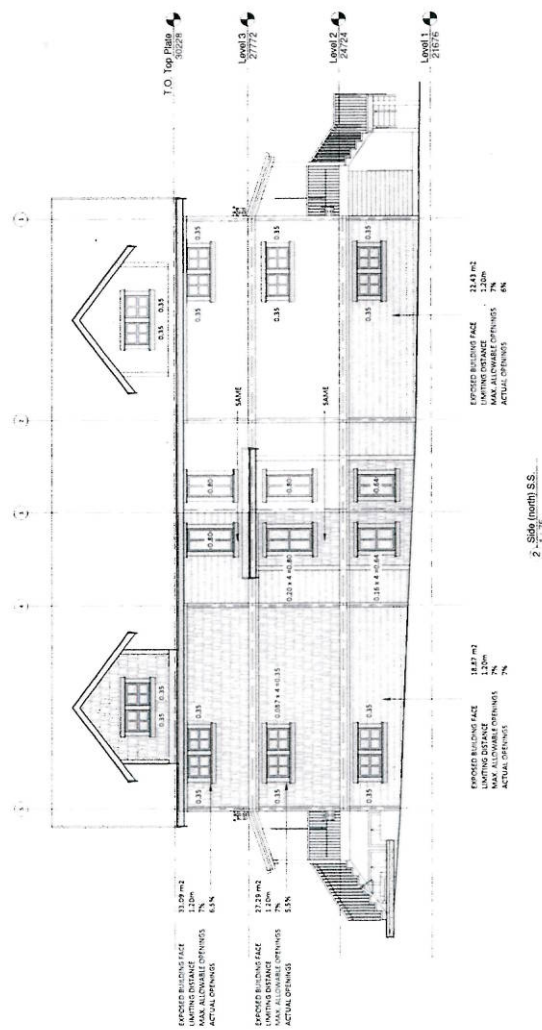
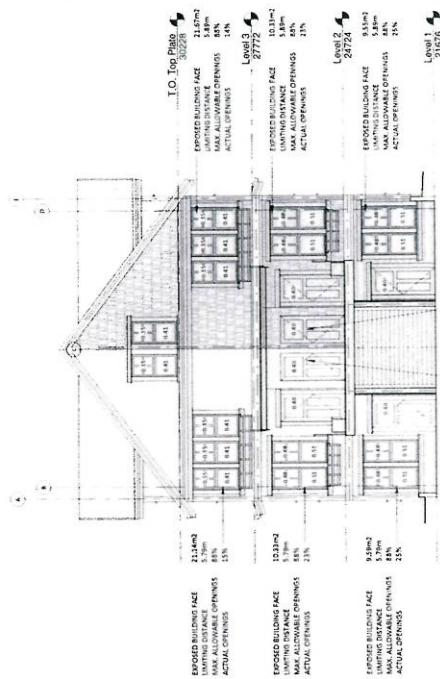
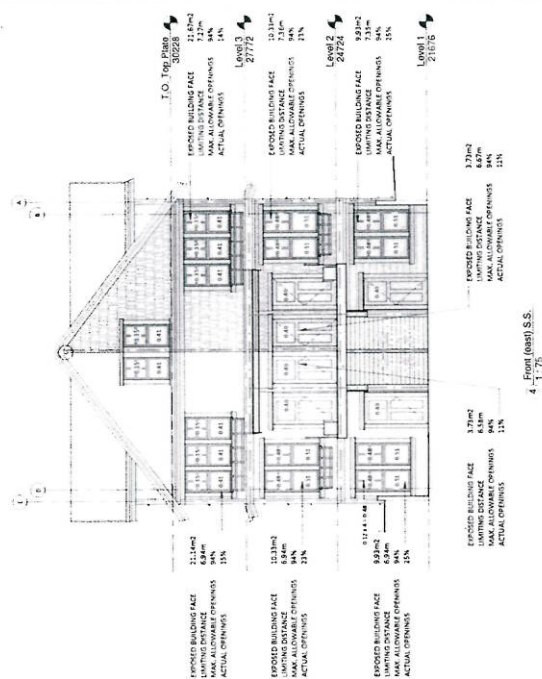
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NOTE: ALL CALCULATIONS SHOWN COMPLY WITH TABLE 9.10.14.4A, RESIDENTIAL OCCUPANCY



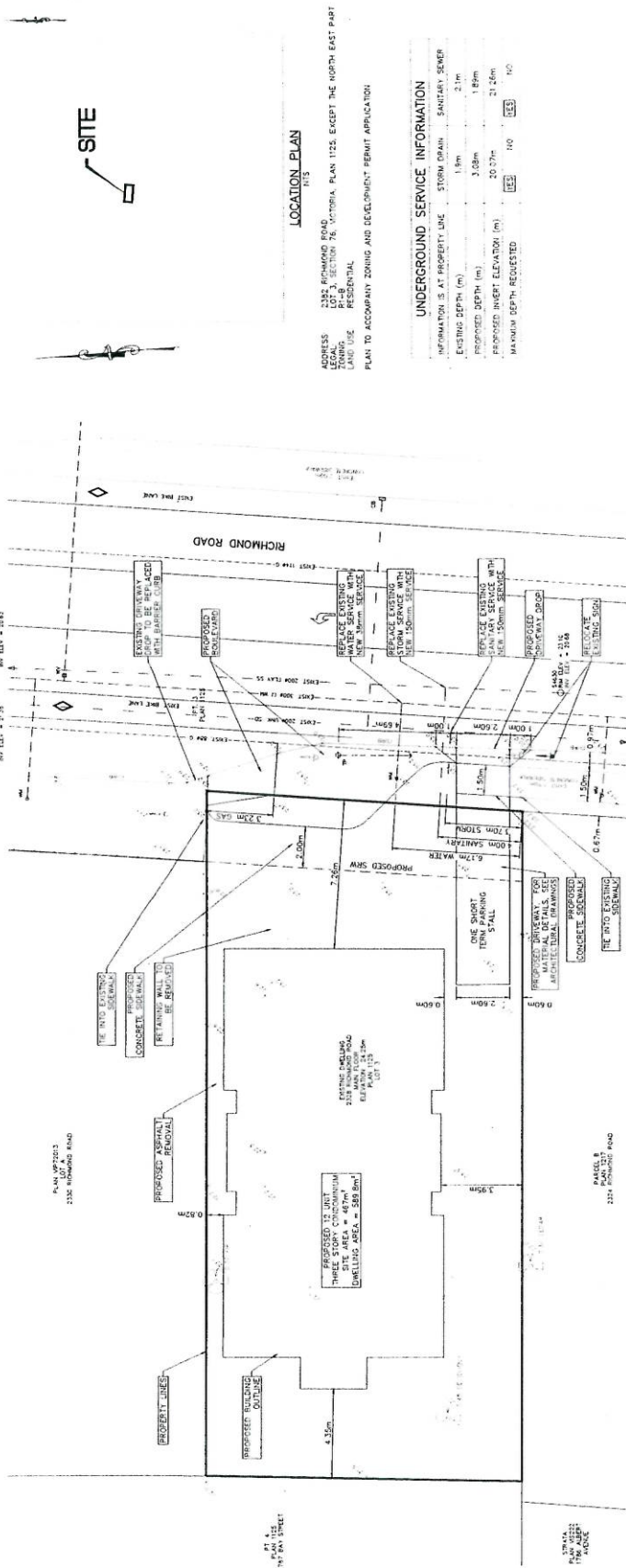
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THE PHYSICAL CONTACT OF THESE SHEETS  
AUG 20 2014

PLANNING & DEVELOPMENT DEPARTMENT  
DEVELOPMENT SERVICES DIVISION

THE PARADOX IS A CONCEPT OF ANOMALIC BEHAVIOR NOT BE RECOGNIZED OR BELIEVED WITHOUT UNDERSTANDING REGRESSION FROM CHRISTIANITY INTO AGNOSTICISM.



[illegible]

WATER NOTES:

WATER SERVICE CONNECTION TO BE 38mm TYPE K COPPER AS PER C6V STD DWG. NO. W20 55

STORM DRAIN NOTES:

STORM DRAIN CONNECTION TO BE 150mm AS PER CIV STD Dwg No S7 55

SANITARY SEWER NOTES

SANITARY SEWER CONNECTION TO BE 150mm AS PER CIV STD DWG. No. S7 55

## QUALITY MOVIES

**SHALLOW DRILLING NOTES.**

EXISTING BC HYDRO, TELUS, SNAW WAGLE AND OTHERS BC INFRASTRUCTURE INFORMATION SYSTEMS. DRAWINGS IS SCHEMATIC AND FOR INFORMATION ONLY. REFER TO UTILITY COMPANY DESIGN INFORMATION FOR EXISTING UTILITY INFORMATION. UTILITY INFORMATION WITHIN THESE AREAS AND

DRAWINGS FOR CONSTRUCTION DETAILS, CONSTRUCT UNDERGROUND UTILITIES AS SPECIFIED AND ACCORDANCE WITH BC HYDRO, TELUS, SHAW CABLE SPECIFICATIONS AND DRAWINGS

CONTACT BC HYDRO, TELUS, SNAW CABLE AND FORTIS BC 48 HOURS PRIOR TO THE START OF AN

## EXAMINATION

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City of Victoria

AUG 20 2014

Planning & Development Department  
Development Services Division

[illegible]

April 17, 2014

The City of Victoria  
Attention: Mayor and Council  
1 Centennial Square  
Victoria, BC V8W 1P6



**RE: 2328 Richmond Road proposal for Official Community Plan Amendment, Rezoning and Development Permit Application**

**Description of Proposal**

The proposal seeks to rezone the existing R1-B designated site at 2328 Richmond Road to a site specific zone to support the development of a three storey, twelve unit residential building. The proposal will densify the residential use along an urban arterial, adjacent to a designated Large Urban Village providing market, affordable housing in immediate proximity to the Royal Jubilee campus.

**Government Policies**

The site is adjacent to the designated development permit area DPA 5: Large Urban Villages. The proposed development complements the special conditions of the designation, including:

- "potential for revitalization and capacity for...multi-family(multi-unit) residential...development";
- "low to mid-rise building types that include...multi-unit residential...with built form and character that defines streets and sidewalks with building facades and locates parking away from streets";

The project is consistent with the objectives of the adjacent designation of the Jubilee Village, including:

- "design...in a manner that encourages pedestrian and cycling use and enhances the experience of pedestrians and cyclists";
- Proposing a development type and form to "ensure sensitive transitions between the Royal Jubilee Hospital campus, particularly its commercial uses with adjacent residential areas."

With respect to Neighbourhood Directions for Jubilee in the OCP, the proposal is consistent with the vision in the citywide context and includes "multi-family residential...within walking distance of Fort Street", as well as consistency with the strategic directions by offering an appropriate land use transition from the Royal Jubilee Hospital development.

Further, with respect to the OCP, the land management and development policies, transportation and mobility policies, placemaking policies, and housing policies in the plan are reflected in the development proposal, specifically:

- "That...Urban Villages become progressively more complete so that...all residents can reach goods and services to meet daily needs within a 15 minute walk of home"
- "That...city neighbourhoods contain a range of housing types suitable to people with a mix of incomes, living in a variety of household types";



- Place-based land use management by proposing a Traditional Residential building form which is “low-rise multi-unit...up to three storeys in height located along arterial....roads” with consistent Urban Residential density due to the proximity within 400 meters of the Jubilee Large Urban Village;
- Affords a consistent mobility prioritization in supporting pedestrian oriented lifestyles first, cyclists (both people powered and motorized) second, with immediate access to transit along major arterials, and limits single occupancy vehicle use to a single, transient stall;
- Providing “a comprehensive suite of permanent on-site alternative travel supports and active transportation infrastructure, including...short-term and long-term bicycle parking facilities”, mobility scooter parking and charging stations, and compact scooter/motorcycle parking, in addition to a single, transient vehicle parking stall;
- “That new buildings and features contribute to the sense of place in development permit areas...through sensitive and innovative responses to existing form and character”;
- “That social vibrancy is fostered and strengthened through human scale design of buildings”;
- “That a wide range of housing choice is available within neighbourhoods to support a diverse, inclusive and multigenerational community”;
- And offering “a diversity of housing types to create more home ownership options”.

### **Project Benefits and Amenities**

The proposal offers a compact housing typology in proximity to a major employer in the municipality. The twelve, one bedroom units are intended to appeal to singles or couples and on the ground floor, seniors, with the provision of two adaptable one bedroom units accessible via ramp and equipped with charging outlets and space for mobility scooter parking. The project is configured to enable a statutory right of way along Richmond Road, creating a more gracious bus stop for BC Transit operations and a separated sidewalk from the roadway – a significant streetscape improvement along this busy arterial.

### **Need and Demand**

The proposal creates affordability in offering a compact, market housing format on a traditional single family lot. The demographic that this housing type will appeal to, will foster greater resident diversity in the neighbourhood, while offering transitional density of multi-unit residential between the institutional uses of the hospital and those of the traditional single family density to the west. Appropriately located along a major arterial, the housing leverages access to major transit routes, services and amenities, and offers alternative on-site travel supports, thereby solidifying traffic reduction strategies adjacent to the Large Urban Village of Jubilee.

### **Neighbourhood**

The proposed uses, form and character of the development are consistent with the Traditional Residential typology, with the exception of density. A modest increase above the 1:1 density provision of Traditional Residential is sought in order to secure affordability for each of the units. Located directly off a major arterial and adjacent to the Royal Jubilee Hospital campus, the proposed density realizes a transitional residential type to the single family character to the west, thereby locating density along the perimeter of this established neighbourhood.

## **Impacts**

The proposal is consistent with the use and general form and character of the neighbourhood. Immediate neighbours will experience less privacy than a single family home with reduced setbacks, but will enjoy the benefit of a quality, new development which will bring new homeowners to the neighbourhood, a vibrancy that will enhance security and social dynamics.

## **Design and Development Permit Guidelines**

The proposal will conform to the referenced applicable guidelines for DPA 5 including the advisory design guidelines for buildings, signs and awnings and guidelines for fences, gates and shutters. In addition, the proposal meets the guideline by which "buildings are encouraged to have three to five storey facades that define the street....and buildings entrances that are oriented to face the street."

In addition, the project is consistent with the objectives of DPA 5: Large Urban Villages, specifically:

- "To accommodate 40% of Victoria's anticipated population growth in...Large Urban Villages";
- "To achieve a high quality of architecture...in all Large Urban Villages to enhance their appearance and identify villages as important neighbourhood centres";
- "To design all Large Urban Villages in a manner that encourages pedestrian and cycling use and enhances the experience of pedestrians and cyclists"; and
- "to...ensure sensitive transitions between the Royal Jubilee Hospital site";

## **Safety and Security**

The proposal embraces key CPTED principles. The massing and its orientation to the street and adjacent sites promotes natural surveillance. Walkways, fencing, lighting and signage promote movement to and from the building's entrances, creating strong connections to the street, overlook and visibility. Public and private is clearly delineated through paving treatments, signage and building edge, reinforcing ownership/control thereby discouraging trespassing or nuisance behavior.

## **Transportation**

The project does not meet the vehicle parking standards of Schedule C. The proposal reinforces the promotion of alternative travel by providing alternate travel support infrastructure on-site, prioritizing a pedestrian and bicycle culture over vehicle users. Within the context of the dimensional and access constraints of the physical site, the provision of onsite parking is limited to more compact transportation modes and a single, transient vehicle stall to support loading, visitor and intermittent vehicle use by residents.

The project meets the bicycle parking standards of Schedule C with provisions for residents and visitors.

## **Heritage**

The existing single family house on the property has no heritage status. No heritage buildings will be impacted by the proposed development.



### **Green Building Features**

The proposed development occurs on an existing developed site adjacent to a Large Urban Village, therefore the ecological footprint of the larger community is not expanded. Socially, the project reflects demand in the immediate community for affordable market housing in proximity to employment, amenities, transportation and services.

While no specific metric or green rating system will be pursued on the project, best practices with respect to durability, energy efficiency, water conservation, construction waste management, and the specification of quality, low toxicity materials will be applied.

### **Infrastructure**

Preliminary review of engineering infrastructure confirms adequate capacity for sewer, storm and water for the proposed development. It is anticipated that a detailed design and review will confirm the necessary capacity.

Sincerely,

A handwritten signature in black ink, appearing to be 'JH Knappett', written over a horizontal line.

John H. Knappett, P.Eng.

Director

2328 Richmond Holdings Ltd.

# 2328 Richmond Holdings Ltd.

555 Pembroke St., Victoria, BC, V8T 1H3

August 20, 2014

## The City of Victoria

Attention: Mayor and Council  
1 Centennial Square  
Victoria, BC V8W 1P6



**RE: 2328 Richmond Road revised proposal for Official Community Plan Amendment, Rezoning and Development Permit Application.**

In response to the Application Review Summary dated Wednesday, May 21, 2014, we are pleased to submit our revised proposal for the above noted development. The subject of this letter is to provide an itemized update and clarification of new information on the proposal and should be reviewed in conjunction with the revised, bubbled drawings.

Specifically, the conditions to be met prior to the Planning and Land Use Committee are:

- 1. The proposal requires an Official Community Plan amendment to allow the building type and density. As the proposed density exceeds the density anticipated by the OCP, a density of lower than 1:1 should be considered. The proposed building does not fit with the immediate context.***

A density of 1.15:1.0 is proposed for the project. A reduction of density of .15 to comply with the intent of the OCP would result in a reduction in each suite's area of 6.54 m<sup>2</sup> (70 sq.ft.). The scale of the proposed suites is intended to be modest, but distinguishable in livability from the micro-loft suites predominant in the current market. The building configuration proposes individual entrances to each suite – a door at the street – which results in a 100% efficiency (no internal corridors/common spaces), with in-suite internal circulation, while considering adequate storage, livability and maneuverability for residents. These factors contribute to the project's viability, so while the potential suite area reduction was considered, the density remains as originally requested.

The form and character of the proposal has been modified to more consistently reflect "fit" with the surrounding neighbourhood. Specifically, incorporation of character defining elements of many of the historic residences in the neighbourhood including roof type and pitch, inclusion of dormers, window proportion and type, cladding and trim elements. Further, the resultant building type falls within the OCP's definition of Traditional Residential building forms; that is "low-rise multi-unit...up to three storeys in height located along arterial...roads."



## **2328 Richmond Holdings Ltd.**

555 Pembroke St., Victoria, BC, V8T 1H3

- 2. The proposed development on the lot should be functional, with adequate parking to serve the occupants. Staff are concerned about the lack of parking. It is noted that parking is an extremely sensitive issue in this area because of the lack of available street parking.***

The parking incorporated into the proposed development is adequate and appropriate for the target resident population for the project. Specifically, provision has been made for the allocation of one parking space to host a dedicated car share vehicle, one intermittent parking space for visitors and short term vehicle loading/unloading, two mobility scooter spaces including charging, twelve secure bicycle parking spaces and six visitor/short term bicycle parking spaces.

The proposed housing typology, one which seeks to provide multi-family density on a single family lot, is intended to offer affordability in locations in the City which are well serviced by alternative modes of transportation and in proximity to places of work and supporting commercial activities. The project site is well positioned within a highly walkable neighbourhood, well supported by major public transportation corridors and adjacent to a major regional employer, the Royal Jubilee Hospital campus, as well as a major grocery store and similar amenities.

The target market for the project is individuals who do not own a single family vehicle, but may require occasional use of one (a car share parking space has been included and the Developer will provide a car share vehicle and purchase a car share membership with Victoria Care Share Co-operative for each unit). Visitors to the residence with a vehicle are accommodated by a second short term stall located in tandem behind the car share stall, a space which also accommodates loading (move in/move out activities or deliveries). Two mobility scooter spaces are provided for the rear, lower level units, which are also designed to provide accessibility for seniors or individuals with mobility challenges. Finally, bicycle and/or scooter parking is accommodated on site through the inclusion of both enclosed/secure bicycle parking facilities as well as a visitor bike rack at the street.

As a mitigation strategy to address neighbor concerns regarding vehicle parking, we propose to enter into a covenant (which will be disclosed to purchasers) to disallow residents from this address from registering their motor vehicles with the City of Victoria as "residents" for the purposes of "residential only parking" privileges. This would effectively exempt any residents of the building in perpetuity from owning a vehicle and parking it without penalty in the immediate neighbourhood.

- 3. The property should be consolidated with 2330 Richmond to ensure the logical assembly of properties in the area, as per OCP policies. This adjacent property lacks redevelopment potential without consolidation due to size and access constraints.***

## **2328 Richmond Holdings Ltd.**

555 Pembroke St., Victoria, BC, V8T 1H3

The adjacent property owner was approached and has expressed no interest in selling which would enable consolidation.

- 4. *Please provide the street elevation plans on a separate sheet, as the scale makes it difficult to assess.***

The street elevations – existing and proposed – have been provided on a separate sheet to facilitate assessment, and are included in our resubmission package.

- 5. *Conceptual alignment of the curb and sidewalk and frontage improvements is required for Development Permit submission.***

Conceptual alignment of the curb and sidewalk and frontage improvements have been provided by Herold Engineering on their Sheet CO-1, and incorporated into the revised site plan sheet A1.01, included in our resubmission package.

- 6. *The proposed rezoning and potential increase in density for this property may contribute to an overtaxing of the sanitary sewer system. A report prepared by a qualified Engineer comparing pre and post development discharge rates is to be submitted to the Engineering Department. The report is to include measures that the developer intends to take to attenuate the sewage if required.***

Discharge rates and the intended means to attenuate sewage are provided in the attached as prepared by Herold Engineering.

- 7. *Pending alignment of the new sidewalk, there may be potential for a new tree boulevard tree. Please show a new tree on the revised DP submission, based on the design criteria in the Victoria Subdivision and Development Servicing Bylaw 12-042 Schedule C.***

A single boulevard tree has been shown on the revised submission and noted as recommended with respect to species and final location.

Additional review comments were included in the Application Review Summary and are noted as follows:

1. The requested Statutory Right-of-Way of 3.41 meters is acceptable and the proposal reflects consideration of this provision. A formal response to this request by Engineering will be provided prior to submitting a Building Permit application.
2. If the sewage discharge rates determine that some form of sewage attenuation is required, the registration of a Section 219 covenant, committing to attenuate sewage will be registered prior to Public Hearing.
3. All items noted from Permits and Inspections have been acknowledged and addressed through the revised configuration – exit exposure and exit contravention issues have been eliminated.



## **2328 Richmond Holdings Ltd.**

555 Pembroke St., Victoria, BC, V8T 1H3

As per our original submission and letter to Mayor and Council dated April 17, 2014, we reiterate our request for the establishment of a site specific zone for the proposed residential project.

We trust that the above responses to the Application Review Summary further support the proposal for providing innovative, affordable residential accommodation within an appropriate location in the community. We welcome the opportunity to appear before the Planning and Land Use Committee and our continued work with staff to realize this project.

Sincerely,

A handwritten signature in black ink, appearing to be 'JH Knappett', with a long horizontal line extending to the right.

John H. Knappett, P.Eng., Director  
2328 Richmond Holdings Ltd.

c/o 1766 Haultain Street

Victoria, B.C., V8R2L2

April 17, 2014

Mayor Dean Fortin and City Council

1 Centennial Square

Victoria, B.C., V8W 1P6

Re: Proposed Rezoning Application...2328 Richmond Road



Dear Mayor Fortin and City Councillors:

The North Jubilee Neighbourhood Association hosted a CALUC meeting on Wednesday, March 26, 2014 in connection with the proposed rezoning application for 2328 Richmond Road. Twenty residents were in attendance. John Knappett(developer) and Christine Lintott(architect) presented the plans for a 3-storey, Strata development, 12 unit building with outside entrances. Two parking stalls are available for deliveries; possible car share, etc. plus 12 covered and locked bicycle racks. Jason Leslie and Gene Miller also answered questions in connection with this proposal featuring affordable housing (two units are wheelchair accessible) and easy access to bus routes.

Residents remarked that although the design was appealing, the location was not as it is too close to the corner of Richmond and Bay which is extremely busy with through traffic and both left and right hand turns. The two short term parking stalls would only be accessible through a right hand turn and as there isn't any turning space provided on the property, automobiles, delivery vans, etc. would have to back in or back out. Parking is a major concern for residents, as all the nearby streets are posted residential parking only. This type of development is targeted for buyers who do not have cars, but there isn't any way to control the sale of the units to clients who have automobiles. This presents the problem of where their cars are parked as well as any visiting guests. It was suggested that the hospital parkade could be used by visiting guests in the evening, but even if this is a viable option at this time, it would not be a permanent solution as the hospital campus continues to expand.

Concerns were expressed about the lack of green space surrounding the building and also that there aren't any decks for the units. There are not any amenities provided that would compensate for the density and loss of neighbours with this type of project. As North Jubilee has only one small park located at Fern Street Park, all green space, including residential gardens, is valued. With all of the streets in our neighbourhood only one block long and existing between arterial and secondary arterial roads, residents would prefer that Richmond Road retain a human scale and not become a transportation corridor similar to Shelbourne between Haultain and Hillside. That this type of project could set a precedent for Richmond Road in North Jubilee was another concern. Another question raised was whether the units would be owner-occupied or perhaps purchased by investors as rental properties.



2.

The developer advised that this project is not viable as a two-storey, 8-unit proposal, but that there was a possibility of redesigning it to accommodate more bike racks. The present design is a highly efficient use of space and his company builds quality projects and although this would not be a LEED building, it would be highly energy efficient. One resident voiced his approval of the project for buyers not having cars.

As our community already supports a very large institution situated in our neighbourhood, thereby constantly coping with the increased traffic generated by staff, patients, ambulances, delivery vehicles, etc. for the hospital campus and the surrounding medical buildings as well. As the campus continues to grow as indicated by the Master Campus Plan, our neighbourhood will have more density added to an already overburdened area.

The proposal for 2328 Richmond Road offers more density for that area; more traffic; loss of green space; and does not offer any amenities for the neighbourhood. This type of density may meet many requirements of the developer and the City, but does not add to the livability of the North Jubilee area.

Yours truly,

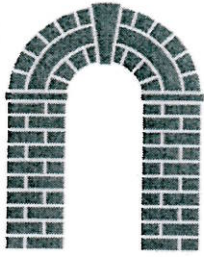
Jean Johnson, Land Use Chair on behalf of Committee Members

Wilma Peters, Patrick May and Janice Stewart

Cc: Deborah Day, Director Sustainable Planning and Community Development

Lucina Baryluck, Senior Process Planner

John Knappett, Knappett Projects Inc.



North Jubilee  
Neighbourhood  
Association

c/o 1766 Haultain Street

Victoria, B.C., V8R2L2

May 23, 2014



Mayor Dean Fortin and City Council

1 Centennial Square

Victoria, B.C., V8W1P6

Re: REZ #00446 and DP #000365 for 2328 Richmond Road

Dear Mayor and Councillors:

The NJNA Land Use Committee hosted a CALUC meeting on Wednesday, March 26, 2014 in connection with the proposed rezoning application for 2328 Richmond Road and forwarded the comments from this meeting in our letter dated April 17, 2014.

In response to Anita Walper's April 24, 2014 letter which enclosed the rezoning application, applicant's letter and plans, which the Land Use Committee has reviewed, the main concern is parking for which there is none on Richmond Road. The block-long streets in our neighbourhood between arterial and secondary arterial roads are all residential parking only. There cannot be a guarantee that the owners of these units will not own a vehicle. Where would their company park? Where would service vehicles park? The revised plans indicate one short term parking stall to provide a space for deliveries for 12 units; loading and unloading of transportation modes required by the two units that are wheelchair accessible; short term visitor parking; etc. We did note that 12 bike racks; 6 scooter stalls and two stalls for electric carts have been provided. A question has been raised about how the garbage and recycle trucks would access this site.

The plans for the second storey entrances on both the East and West elevations have been changed since the CALUC meeting in which the four entrances were shown as two on one side and two on the other whereas in the new plans the entrances are four doors side by side which do not appear as welcoming, or offer as much privacy, as the previous design. In the applicant's letter to City Council he states "the proposed density realizes a transitional residential type to the single family character to the west, thereby locating density along the perimeter of this established neighbourhood". While this type of density at arterials roads is generally buffered by several neighbourhood blocks in the core, our neighbourhood streets are all one-block long which tends to create increased density throughout our community.

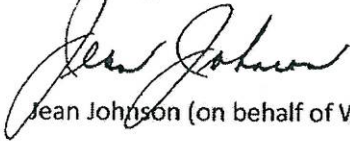
We are uncertain if this project is proposed for the Large Urban Village in the Jubilee area. From the map it appears that the Village includes the hospital campus and Richmond to Pembroke Street and possibly not 2328 Richmond Road.



2.

The proposal has many progressive features including single bedrooms, separate entrances, in unit laundry and the pricing indicated, but the density of 12 units on a single family lot does not fit into this location in our neighbourhood. Please refer to our April 17<sup>th</sup> letter re this proposal as all the comments and concerns listed are still valid.

Yours truly,

A handwritten signature in black ink, appearing to read "Jean Johnson", written over a horizontal line.

Jean Johnson (on behalf of Wilma Peters and Patrick May)

NJNA Land Use Chair