

June 12, 2020

Mayor Lisa Helps & Council
City of Victoria
1 Centennial Square
Victoria BC V8W 1P6

**Re: Revised Rezoning & OCP Amendment Application for Harris Green Village
(903, 911, & 1045 Yates Street, 910 View Street, 1205 & 1209 Quadra Street)**

Dear Mayor Helps & Council:

This letter, along with supporting documentation, updates our original submission dated January 30, 2020, responds to staff review comments, and considers additional input and feedback received from subsequent staff meetings. This letter should be read in conjunction with the letter accompanying our original submission.

Harris Green Village is a large project and, with the many demands on staff and working in the current environment of the COVID-19, we would like to initially convey our sincere appreciation to staff for professional and timely feedback, and assistance in processing this application.

By way of summary, the Harris Green Village application proposes to rezone one and a half city blocks from existing commercial and mixed-use zones to a new site-specific zone. Given the combined size of the sites, the application presents a unique opportunity to insert a positive and transformative change to the Harris Green neighbourhood.

The two sites comprise a total of 19,860 m² in Downtown Victoria. At build-out, the project will provide approximately 1,500 purpose-built residential rental units, 10,200 m² of commercial retail/office space, and 4,500 m² of amenity space that includes about 500 m² for child care. A total of 119,500 m² of floor space is planned to be developed in three phases. A signature element of the Harris Green Village project is the creation of a central plaza and open space that will include both active and passive areas.

In addition to clarifying and expanding on the urban design rationale, the project has introduced an affordable housing component. Starlight Developments is critically aware of the City's priorities on the provision of affordable housing. It has taken an in-depth analysis to determine the financial viability of a rental project to include an affordable housing contribution given the other important amenities that include:

- A significant increase in the Victoria's rental housing stock that will improve supply, choice, and flexibility for individuals and families;
- A range of unit sizes and types (studios to three-bedroom units) for individuals, couples, and families;
- A regionally significant open space to create a vibrant "Yates Street Plaza," a terraced area with amphitheater seating, and "View Street Green" that comprises approximately 1,982 m² (one-half

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acre), which is approximately twice the amount of open space and public realm amenity identified in the *Downtown Core Area Plan* (DCAP);

- A children’s daycare and associated outdoor space;
- Enhanced street animation and pedestrian connections between and within streets;
- Extensive on-site amenities for future tenants;
- Development of a model stormwater management regime and raingarden systems;
- Comprehensive integration of landscaping elements within the site, and connectivity with the streetscape, pedestrian sidewalks, and boulevards; and
- Provision of a separated bike lane on Vancouver Street, with connectivity to the established bike lane network.

Starlight recognizes the importance the City has placed on affordable housing. Throughout the public engagement processes, when asked what was important, the overwhelming majority of responses wanted to see the creation of a significant piece of multi-purpose public open space. This observation and request were also reiterated by the Downtown Residents’ Association. The Downtown Core Area Plan (DCAP) echoes this sentiment, and further recommends a public amenity size of 800 to 1,200 m². Starlight has placed an emphasis on this particular public amenity. The signature space of 1,982 m² will be completely programmed, paid for, and maintained by Starlight, and will be guaranteed for public use and enjoyment through legal agreements with the City. Ongoing costs for operations and maintenance of the space will be borne by Starlight. In addition to the signature public space, other smaller “pocket” plazas are strategically located throughout the project to provide additional public amenity spaces.

City housing policy recognizes that purpose-built rental projects do not have the same economic characteristics as condominium developments, and are therefore exempt from the *Inclusionary Housing & Community Amenity Policy*. In addition to the above described amenities, Starlight has stretched the financial proforma to bring the affordable housing component into reality (requiring a floor space ratio of 6:1). Starlight voluntarily agreed to a land lift analysis by an independent third-party consultant retained by the City, and work is underway to confirm the financial capacity of the project to provide affordable housing.

Details on the affordable housing contribution are described below.



Affordable Housing

Starlight recognizes that Victoria is challenged in both the supply of housing (with one of the lowest vacancy rates in Canada), and in housing affordability relative to local incomes. In addition to the entire development providing market rental, Starlight sought to include a viable affordable component, and has prepared many internal financial proformas to determine what can be done.

As part of this proposed development, Starlight is proposing an additional 0.5 FSR of residential floor area beyond what the DCAP had contemplated for these sites (from 5.5 to 6.0 FSR). We are pleased to note that this additional residential floor area makes it possible for Starlight to include affordable rental units in the development. Fifteen percent (15%) of the additional floor area, representing approximately 23 units (or 22% of the first phase units), will be offered at median income affordability per the *Victoria Housing Strategy 2016-2025, Phase Two: 2019-2022* report. Median income rents, by unit type, from the table titled *Affordable Maximum Rents by Bedroom Size and Income Bracket* were used.

As a further commitment to the affordable housing contribution, Starlight intends to deliver these units in the first phase of development, so are available as soon as possible.

Review of Staff Comments

The following pages provide a summary of the application changes made in response to City staff comments. The design team has spent the last four months in an intense exercise to confirm the urban design solutions that best fit the site, the neighbourhood, and the community as a whole, and integrating the design elements within a viable project. The revised Urban Design Manual and Rezoning Booklet reflect the analysis and feedback requested by City staff. The following table summarizes the main project parameters.

Description	900 Block	1045 Block	Total
Site Area	13,527 m ²	6,337 m ²	19,864 m ²
Floor Area	81,162 m ²	38,021 m ²	119,183 m ²
Floor Space Ratio	6.0:1	6.0:1	6.0:1
Height (Storeys)	28 (24)	19 (17)	N/A
Open Site Space	28.4%	12%	N/A
Parking Spaces	943	460	1,403
Bike Parking (LT/ST) Spaces	1,468	680	2,148



Rationale for Height & Density

The proposed form and urban design approach both respond to the site's central and prominent location. The tower and podium typology allow for a sensitive response to the street, the block, and the city context. Buildings are configured into pedestrian-scale blocks with corner plazas, and podium heights establish appropriate street wall-to-width ratios on each facing street. Podium massing is shaped to address the street and provide sunlight into residential courtyards. Slender, elegant towers punctuate the block at strategic locations to optimize solar performance in the public realm and contribute to Victoria's skyline when seen from afar.

A series of design studies arrived at what the design team believes is the most appropriate massing for the site and its relationship to its surroundings. Key design characteristics include: 1) splitting of the 900-block and creating a mid-block connection, 2) adding significant public space, 3) framing the street, 4) sculpting the podium, and 5) strategic placement of height.

The results of this analysis concluded the best way to accommodate the components of the development is to design a meaningful podium base with tall, slender towers purposefully sited within the sites. A balance between podium and tower heights was analyzed to determine the appropriate podium height to frame the street, not overpower the public realm, and maintain floor area. It was also determined that taller, slender towers best-fit the site, and reduce impacts, such as shadows and wind. The positive outcomes of this approach are increased sky views and facades that define and vitalize the streets while dispersing shadow casting.

A variety of tower forms, heights, and locations were explored to determine the configuration that resulted in the best urban design performance. The preferred location focuses height to the centre of the 900-block, with a gradual decline in height towards Cook Street. The massing is accommodated in slender towers specifically placed to frame Yates Street and maximize the amount of sunlight on courtyards and the public plaza.

Please refer to the new sections in the updated Urban Design Manual and Rezoning Booklet to see expanded design studies and rationale for the proposed massing, height, siting, and orientation of towers. Included in the revised manual and booklet are specific view studies along the streets, including distant views. Reference to, and relationship with, the *Urban Forest Master Plan* has also been included.



Existing Residential Units

A request was made to identify the number of bedrooms in the existing small residential component of the 900-block site. There is a total of 15 units comprising 12 one-bedroom and three two-bedroom units. Starlight is mindful of its obligations to existing residential tenants, and to providing a respectful relocation plan in keeping with the *City's Tenant Assistance Policy*. The location of the apartment units is not part of the first phase of development, and there is a minimum of four years before any relocation planning is required. In many respects, Starlight is better equipped than many developers to provide seamless tenant transitions because of its management strength and other existing rental projects in Victoria. Starlight has communicated with these current residents and will continue to keep them well-informed as the project progresses.

Crime Prevention Through Environmental Design (CPTED)

A more detailed CPTED analysis was requested in the Application Review Summary. The revised rezoning application includes a separate section describing the CPTED principles to be adopted in subsequent Development Permit applications, and how the proposed urban design guidelines adhere to the principles of good CPTED design.

Wind Study

A wind study has been prepared by Rowan Williams Davies & Irwin of Guelph, Ontario, in which a scaled model of the project was produced and placed in a wind tunnel to determine wind implications and conclusions.

The results of the study determined the siting and design of the towers measured very favorably. There is one location identified at the corner of Yates and Quadra Streets with a lower rating, but this situation could be mitigated through typical strategies, such as strategically placed landscaping. A copy of the wind study forms part of this resubmission package.

Tenure

There are no plans to strata title any of the project components. The residential units will be purpose-built rental units.

Urban Design Manual & Rezoning Booklet Formatting

The documents have both been reviewed and restructured to provide consistency. Wording is amended to ensure a degree of flexibility in the guidelines while providing prescriptive terms, such as “must,” “will,” and “shall” where appropriate to meet the overall design objectives.

Phasing

It is anticipated the project will be constructed in three phases. Phase 1 will be 1045 Yates Street (Harris Chrysler dealership site). A development permit application for Phase 1 is being submitted at the same time as this updated zoning resubmission. Several models have been prepared to examine how best to phase the 900-block Yates street. The final phasing decisions have not been determined and will depend (in part) on negotiations with anchor tenants.

The two city blocks are under the same ownership and property management, and as such it is in Starlight’s interest to minimize impact and disruption to the operations of tenants during construction. The phasing plan considers the best way to minimize disruption to existing tenants and allow for a seamless as possible transition. An extensive communications and coordination plan will be developed to provide commercial tenants with as much time as possible to make business decisions related to their future plans, and to properly manage the relocation requirement of the 15 residential units.

Building Setbacks & Evolution of the DCAP Design Direction

A new section in the Rezoning Booklet directly addresses building setbacks and building envelope criteria. Setback considerations combine both what is appropriate to provide the correct height-to-scale ratios along all abutting streets, and arborist considerations to support the health of established boulevard trees, particularly along Cook and Vancouver Streets.

Detailed studies have been conducted and setbacks established specific to the unique characteristics of each street and for the new Yates Street plaza. The analysis includes an assessment of balcony design and window-to-wall ratios.

Podium Heights



The urban design rationale in the Rezoning Booklet has additional detail about determining the height and sculpting of the podiums to frame the streets. Each street has its own identifiable characteristics, including right-of-way width, and the proposed podium heights respond to these contexts. Detailed shadow studies ascertained the impacts on shadowing of adjacent sidewalks, and the outcomes of these studies are included in the Rezoning Booklet.

Harris Green Plaza Size

The key amenity of the project is the central plaza and park space located in the middle of the 900-block Yates Street. Measured to the building frontages framing the plaza, the total area is 1982 m² (21,334 sf). This area is significantly larger than what is recommended in the DCAP, which indicates a plaza between 800 and 1,200 m². The revised guidelines and Rezoning Booklet provide greater detail on the plaza, as well as the hard and soft landscape features.

Minimum Glazing at Street Level

A new section in the Urban Design Manual references wall-spacing and glazing ratios along the primary commercial street frontages.

Updated Landscape Design: Public & Private Realm Open Space

The development falls within the *Downtown (New Town) Public Realm Plan*, and streetscape standards. Updated landscape plans provide greater design detail and respond to staff input and comments along public streets and the central plaza. Rain gardens have been refined and incorporated along the Yates and View Streets' frontages and coordinated with the civil drawings.

Pedestrian lighting, custom wood benches, and specialty paving will conform with the new town design objectives. New raised planters, new boulevard trees, and raised concrete planters with custom wood benches have been refined. Existing mature chestnut trees along the Vancouver and Cook Street frontages are retained in combination with a grassed boulevard to minimize tree root disturbance. All boulevard trees are specified with Dobney grates, per City staff request.

The Harris Green Plaza is divided into three-character areas, each with its own features to allow for a variety of experiences within the space. The upper Yates Street area combines feature sculpted design elements, specialty paving, and raised planters with specimen trees and seating. The middle section, referred to as the "Harris Green Terrace", combines seat steps and raised planters. The lower "View Street Green" area combines lawn, raised planters, and platform seating.

Interior amenity courtyards for residents of both the 900-block and 1000-block locations include a combination of grassed areas, benches, outdoor kitchens, enclosed dog-run areas and children's play areas. In the 1000-block site, outdoor areas for a children's daycare are also included on the plans.

Site Servicing & Sewage Attenuation Report

The consulting civil engineer has prepared an updated and more detailed site servicing report and assessed the requirements for sewage attention. Copies of both reports are included in this resubmission. The assessment includes addressing storm water management and the coordination of rain garden features between the civil engineer and landscape architect's plans. Generally, the site is well-served by underground services, and servicing requirements can be accommodated. No on-site sewage attenuation tanks will be required.

A 0.9 m SRW along Quadra Street is provided. Intersection detail is also been provided. Plans have been reviewed with the landscape architect to ensure coordination and consistency.

Traffic, Parking & Transportation Demand Management Analysis



All vehicle parking and freight access will be accessed from View Street, as requested by City staff. The project transportation consultants indicate a total of 1,351 parking stalls are required based on the amount of commercial floorspace, number of residential units, and children's daycare space proposed, comprising 1,180 stalls for residents, 166 stalls for commercial space, and five stalls allocated to the daycare.

Given the proximity to Downtown, the integration of the development's residential and commercial space, and the growing intention of people who live Downtown to minimize vehicle ownership, a greater emphasis on shared transportation initiatives is important.

A parking study prepared by Watt Consulting Group analyzes bylaw standards and, more importantly, sets out transportation demand options (TDM) that result in proven reductions in parking demands. Chief among the TDM measures to consider are bicycle parking stalls and facilities (including end-of-trip cycling facilities for employees), electric bike parking, cargo bike parking, and carshare (e.g. Modo). It is noted that families are increasingly using cargo bikes, and these bikes have greater space requirements, but are proven substitutes to private vehicle ownership/usership.

Each phase of development will be subject to a Development Permit, at which time specific parking requests and any variance from Schedule C parking requirements will be submitted. The Watt Consulting report will be used to guide the size and extent of TDM measures appropriate for each phase.

The consulting transportation engineers have also reviewed and updated schematic plans to accommodate traffic signalization at Cook and View Streets, and a separate left-hand turn lane at Quadra and View Streets. They have also evaluated traffic/lane requirements along Yates Street all per direction by City staff.

Third Party Utilities

The project's civil and electrical consultants have been in contact with third party utilities (hydro/telephone/gas/cable) to confirm access to services. In discussions with BC Hydro, and in review of the solutions and outcomes of other development projects nearby, placing hydro permanently underground is not possible because of servicing complications of current properties serviced overhead. Like many of the new projects Downtown, during construction,

wiring may be temporarily placed underground in front of the developing street frontage for safety reasons but is re-established above ground once the project is complete. It is anticipated the same practices will be apply during the phasing of this project.



Green Features & Energy Efficiency

A more extensive discussion of the sustainability elements and rating analyses for the project will be addressed at the time of Development Permit applications. However, the provision of more than 1,500 residential rental units within walkable distances to places of work, recreation, community, medical services, shopping, and other services will significantly reduce the use of vehicles. With transit hubs nearby and the location on/near the extensive bike lane network, it is possible to get to most areas of the region without the use of private vehicles.

Green aspects of the project include:

- As a mixed-use, transit-oriented project, the development will provide a local option for housing, shopping, and leisure, and with a childcare facility helping to further support the growing community.
- The urban infill nature of the project adheres to the principle of promoting development on existing urban sites, diverting development pressure from greenfield locations and making more efficient use of existing infrastructure.
- The project supports a high degree of walkability and cycling access to nearby amenities for residents, thereby reducing vehicle trips;
- Car share and load sharing EV stations are provided to reduce CO2 emissions.

- Extensive bike parking, lockers, and a bike repair station are provided.
- Landscape and stormwater management strategies, including partial green roofs, will retain and infiltrate rainwater, limiting the post-development peak water runoff from the development.

To reduce the urban heat island effect, the project is implementing the following measures:

- 100% of the parking is underground;
- The project will provide a variety of landscaping;
- A mix of unit types offer various styles of living with access to balconies and/or to large terraces on roof decks to provide all with access to the outdoors and views;
- Ample windows will increase natural lighting and provide views improving wellbeing;
- Outdoor water conservation strategies will include water efficient landscaping, and the project will be equipped with water efficient fixtures;
- Ventilation will be designed to satisfy the applicable standards, e.g. ASHRAE;
- The project will target Step 2 of the BC Energy Step Code for “Part 3 high-rise/concrete residential buildings and commercial buildings”;
- Passive envelope strategies reduce reliance on mechanical systems.
- Glazing percentage targets 50% window-to-wall area for the towers to minimize glazing heat loss and heat gain into each unit;
- All windows will be double pane, low-e glazing with thermally broken frames;
- Different glazing specifications on the different building orientations will be considered for maximized solar control and passive heating; solar heat gain coefficient (SHGC) variations can benefit both energy and comfort. Glazing with projected balconies can have a higher SHGC for passive heating benefits during winter months while shaded during summer months. Measures will be based on completed energy modeling;
- Significant daylight penetration into each residential suite increases passive solar gain during winter months, reducing reliance on artificial lighting and providing access to views;
- Continuous weather protection along the commercial unit frontages will also serve as combined solar control to reduce summertime heat gain and mitigate glare issues in locations where buildings are not self-shading.
- Every unit has access to an outdoor balcony or Juliet balcony, providing passive natural ventilation and cooling during shoulder months; and
- Low energy lighting systems, including motion sensors, will be employed in all common areas throughout the project. ENERGY STAR appliances will be used throughout the project.



In Closing

This letter summarizes the key changes made to the original submission, based on City staff comments and continued design development.

A separate Development Permit Application for Phase 1, comprising the 1000-block Yates Street (Yates/Cook/View Streets), is being submitted concurrently with this resubmission. The plans adopt the guidelines and directions contained in the updated Urban Design Manual and Rezoning Booklet.

The intention of this application is to facilitate a vibrant development that complements the character of the existing Harris Green neighbourhood, while providing significant purpose-built rental housing, a mix of uses and building forms, and important public open spaces. Harris Green Village is an exciting and

significant project with the potential to positively shape the future of the neighbourhood and Downtown Victoria.

We look forward to working collaboratively with the City on this special opportunity to enhance and make better use of a significant Downtown location, while responding to the demand for rental housing in Victoria.

Should you require any further information, please do not hesitate to contact me at 250.383.0304 x 122, or dstrongitharm@cityspaces.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Deane Strongitharm". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Deane Strongitharm, RPP, MCIP

Attachs.

cc: Starlight Developments

