

October 17, 2017

Molto Bene Enterprises
3130 Frechette Street
Victoria BC V8P 4N5

Attn: Joseph Calenda

Dear Joseph Calenda:

Re: Proposed Subdivision of Lot 1, Section 34, Victoria District, Plan 13815 and Amended Lot 3, (DD 154245I), Section 34, Victoria District, Plan 4978
File: SUB00805; REZ00602 • 1910 Argyle Avenue and 3327 Richmond Road

A review of your application received on September 21, 2017 indicates the application has outstanding issues that need to be resolved before the application can proceed. It should be noted that these are preliminary comments only and should not be considered as a complete review.

Planning policy review

Shelbourne Local Area Plan policy 6.8 states:

"Maintain a minimum RS-12 parcel size on Mount Tolmie Slopes"

With this policy in mind, along with previous correspondence during initial enquiries with you, this proposal is not supportable from a Planning policy perspective. As you are aware, this policy was put in place in the early 1990's to prevent subdivision of the larger lots in this area to preserve the physical/aesthetic characteristics of the neighbourhood and was initiated by local residents. As noted in your letter of justification and in discussion with residents who attended your neighbourhood meeting, there is little support for your proposal from local residents. This is an important factor when considering any application.

In your letter of justification, you refer to a request to rezone to a "specialized RS-6 zone". We would prefer a request to rezone to RS-6 (Single Family Dwelling) Zone and a Development Variance Permit to vary siting requirements.

The letter also makes the assumption that the remaining corner properties, 1900 Argyle Avenue and 3311 Richmond Road, will eventually be developed into a multi-family development. Again, the local area plan policy does not support that type of development. Using the argument that the applied for subdivision would act as a buffer between the neighbouring larger lots and the future multi-family development is premature.

Although we recognize that the area plan policies are being reviewed, presently this proposal does not meet current policy. In addition, the lots cannot be created in a conventional manner: they require variances or a site specific zone. It is for those reasons that we are unable to support your proposal.

As was indicated in previous discussions, although we could not support the proposal as submitted, a report to Council could be prepared which would include options for their consideration to assist in their decision. As well, you would have the opportunity to present your proposal when it was scheduled for a Council meeting.

Should you choose to proceed with the application as proposed, additional information will be required.

Parks Department review

Parks has a number of concerns regarding the proposal. As was mentioned in previous discussions, a report prepared by an ISA certified arborist is required now as part of the subdivision review. Attached is a copy of the memo outlining the issues and a request for additional information. Please contact Brent Ritson, Parks Referral Coordinator, at 250-475-5526 or brent.ritson@saanich.ca if you have any questions.

Environmental Services review

Environmental Services have noted the following policies in the Shelbourne Local Area Plan that apply specifically to this project:

- "5.1 Seek opportunities to protect indigenous vegetation, wildlife habitats, aesthetic landscapes and views when reviewing applications for change in land use."*
- "5.2 Seek opportunities to preserve indigenous trees, shrubs and plants, (including mosses) and rock outcrops within parks, boulevards, unconstructed road right-of-ways and other public lands."*

In order to address their concerns, Environmental Services agrees that the information requested by Parks is required now to provide comment on the impact of the development in relation to the natural environment. Please contact Ann Klein, Environmental Planning Officer, at 250-475-5459 ext. 3418 or ann.klein@saanich.ca for more information.

Subdivision review

The plans as submitted do not provide all the information we require to properly review the proposal. In particular, the following information is required:

- Lot dimensions for all property lines must be shown on the plan.
- It is unclear as to what the "proposed driveway access" is meant to be. If it is to be a strata access road for proposed Lots 2 and 3, it does not meet our standard width requirement of 7.0 m and does not include a turn around area at the end. If it is meant to be the access strip for Lot 3, this Lot would then be considered a panhandle, in which case the lot area is insufficient. In addition, under this scenario, Lot 2 would have no highway frontage, making it a land locked parcel, which is not permitted.
- Subdivision Bylaw 7452 stipulates that the minimum lot depth for any standard shaped lot is 27.5 m. Proposed Lots 1, 2, and 3 do not appear to meet that requirement. A Development Variance Permit (DVP) is required.

- The building envelopes shown on proposed Lots 1 and 3 do not meet RS-6 (Single Family Dwelling) Zone requirements. A Development Variance Permit (DVP) will be required.
- If the intention is to apply for a “specialized RS-6 Zone” for this project, please provide a summary of all “variances” requested and provide a comparison to standard RS-6 (Single Family Dwelling) Zone requirements.

In your letter of justification, you state that you prefer not to commit to house designs for this proposal. As was mentioned in previous discussions, it has been Council's practice to require conceptual house designs or specific design guidelines when considering in-fill projects. These designs or guidelines would then be secured via covenant prior to the ratification of the rezoning bylaw. You note in your letter that if designs are required, that Planning should recommend a particular housing design. Staff are not able to make that determination. The matter of house design is not solely for architectural style but also related to impacts resulting from size and massing of the proposed dwellings in relation to neighbouring properties. It is up to the applicant to determine what design style may fit in the neighbourhood and whether Council and the residents would support it.

It has also been Council's practice to require that the new dwellings be constructed to a certified BUILT GREEN® Gold or energy equivalent standard. Sustainable stormwater management strategies such as the use of permeable pavers for driveways and patios and the inclusion of rain gardens into landscape plans are also encouraged. Again, these items would be secured via covenant.

It is unclear in your letter as to whether the proposed dwellings will include secondary suites. Please clarify. If suites are proposed, details regarding proposed parking areas on each lot should be shown.

An early response to these requests will avoid delay and permit further review and comment by other departments. If you have any other enquiries, please contact me at 250-475-5494, extension 3414, or email liz.gudavicius@saanich.ca.

Sincerely,



Liz Gudavicius
Subdivision Coordinator

LG/mp
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Attachments

cc: Adriane Pollard, Manager of Environmental Services
Jarret Matanowitsch, Manager of Current Planning
Brent Ritson, Parks Referral Coordinator



PARKS AND RECREATION
Parks

Memo

To: Liz Gudavicius, Subdivision Coordinator
From: Brent Ritson, Park Referral Coordinator
CC: Park Referral Team, DB, JB, Plansec
Date: October 10, 2017
Subject: **1910 Argyle Ave & 3327 Richmond Rd. SUB00805, Rezone from RS-12 to RS-6 to create two additional lots for single family dwelling use**

PARK REFERRAL REVIEW

The following comments are provided based upon Parks review of the plans by Envision Designs and Development:

Site:

- A revised site / tree plan is required. The drawings provided for review do not provide sufficient information for us to review the application.
- The site tree plan needs to show:
 - the location of all trees protected by the Tree Bylaw or within three metres of the property line
 - the location of all trees on the boulevard
 - the location of the existing houses, proposed addition, driveway and other hard surfaces
 - the extent of any proposed re-grading that is outside of the building footprint
 - the location of all existing and proposed underground services i.e., sewer, storm drain, water, electric and telephone
 - the location where replacement trees are to be planted

Include a separate schedule showing tree species and trunk diameter. Tags shall be affixed to the trees with numbers that correspond to the schedule. The location of each tree must be accurately plotted showing the tree tag number attached to the trunk.

Trees:

- The grove of Garry oak trees on and close to the Argyle boulevard are worthy of preservation.
- A tree preservation plan (TPP) is required to assist our review. The TPP shall be prepared by an ISA certified arborist employed by the applicant. The TPP will identify trees that require removal to facilitate subdivision and development of the property and provide recommendations to mitigate the impact on retained Tree Bylaw listed trees. The TPP is required to provide specifications for tree preservation before, during and following construction (including remedial maintenance.)
- The TPP shall include an inventory of Tree Bylaw protected trees that are on the subject property and/or within 3m of the property line. Among other aspects of tree

preservation the arborist may consider relevant, the TPP will provide methods to avoid tree and soil compaction damage while the property is being re-developed.

- the TPP is required to include a site plan showing where temporary barrier tree protection fence is to be erected and or where media to limit soil compaction will be placed.
- the TPP's site plan may not be smaller than 1:250 scale.
- the TPP's site plan shall identify materials storage and work areas
- the TPP's site plan shall show the extent of any proposed re-grading that is outside of the building footprint.
- In 2010 Saanich Council adopted the Urban Forest Strategy. A key goal is "To Protect and Enhance the Urban Forest" Further to this goal is the "No Net Loss" canopy policy. The policy will ensure that every public or protected private tree removed is replaced with a minimum of one tree. Parks recommends the applicant commits to planting replacement trees consistent with the language contained in the Urban Forest Strategy.

Park/Trail:

- There are no parkland or trail opportunities or requirements.

Please contact the undersigned with questions arising from this response.



Brent Ritson, Park Referral Coordinator,
Saanich Parks