

Gibsons Residential Guest Accommodation Policy

PROPOSED
May 31 2022

This document describes Gibsons' approach to regulating Residential Guest Accommodation.

It should be considered in combination with the proposed amendments to Gibsons' Zoning bylaw, Business Licence bylaw, and Notice of Enforcement bylaw, as well as the short Policy Summary with its infographics, visual examples, and F.A.Q.

While both the bylaw amendments and Policy Summary have been written to clearly communicate the policy, this comprehensive document contains (a) all of the thinking and rationale driving the selection of individual policy components, and (b) additional operational details.

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Part I – Major Components and Context

Introduction

Gibsons is a vibrant, in-demand oceanfront community. Full-time residents, part-time residents, and visitors are attracted to the Town's beautiful setting, amenities, relative proximity to the mainland and welcoming atmosphere.

However, for those seeking to visit the community the only options for so-called "traditional" guest accommodation within Town boundaries have included two older hotels along the main highway, and a small number of Bed & Breakfast rooms.

So, it is no surprise that user-friendly platforms like Airbnb and VRBO have led to an increasing number of Gibsons' residential homes being turned into unpermitted guest accommodation (currently 80-100 listings depending on the season). Approximately 90% of these listings are for entire homes or suites¹ and of these, approximately 2/3rd are for accessory suites that might otherwise be used as long-term rentals (equal to more than 8% of Gibsons' total rental housing stock).²

This growth has benefited operators, who can gain additional revenue,³ higher property values and flexibility over the use of their units. It has benefited visitors, who have had greater accommodation choice. And it has benefited businesses who service the guests.

But these benefits have also come with costs, including decreased overall housing availability and affordability⁴ for local residents and workers, impacts to neighbourhood character, and a more difficult competitive environment for traditional accommodation providers (hotels etc.) who are held to a higher regulatory standard.

If Gibsons had an abundant supply of ownership and rental housing, and if costs for both were relatively affordable, the use of some residences for guest accommodation might not

¹ Data from AirDNA, captured April 11, 2021 (only includes listings from the top two platforms: Airbnb and VRBO).

² Data from AirDNA, captured Sept 6th, 2021.

³ Nearly a quarter of entire-home listings are earning more than \$40,000 per year for their owners, with some earning more than \$100,000 per year (data source: AirDNA, retrieved Feb 17, 2022).

⁴ While allowing RGA can make homeownership more affordable for some operators, non-principal residence RGA is generally associated with worsening affordability community-wide. For more information see "[Regulating Short-Term Rentals: a Toolkit for Canadian Local Governments.](#)"

be associated with significant housing impacts. However, this is not the case. Gibsons, like most communities across BC, is experiencing acute challenges with both the availability and affordability of housing, in particular rental housing.⁵ While short-term rentals are certainly not the only, or the most important driver of these housing challenges, they are a clear exacerbating factor and are within the jurisdiction of the Town of Gibsons to address.

It is within this general context that Gibsons Council has approved a set of regulatory goals for the Residential Guest Accommodation policy described in this document.

Goals

Council's regulatory goals for this policy were confirmed by resolution in October, 2021. Listed from highest priority to lowest priority, they are:

Primary Goals:

1. Retaining long-term rental supply in Gibsons⁶
2. Keeping the scale of business appropriate to residential neighbourhoods

Secondary Goals:

3. Responding to the needs of homeowners who wish to have added revenue⁷
4. Providing tourists with accommodation options for staying in and visiting Gibsons

These goals reflect the seriousness of current rental housing challenges in Gibsons, and a strong desire to protect the character of residential neighbourhoods, while nonetheless creating opportunities for residents to earn a bit of extra revenue, and ensuring there are sufficient accommodation options for those visiting the Town.

The Town of Gibsons also has the following operational goals for this policy:

⁵ As outlined in the 2021 Sunshine Coast Regional Housing Needs Assessment Report.

⁶ In communities where secondary market rentals are common (virtually everywhere in BC and across Canada), the local rental market becomes additionally and inextricably linked to the local ownership market. Availability and cost in one impact availability and cost in the other, with individual dwelling units often flipping between the two states of tenure/occupancy over any given period of time. As such, this policy interprets "retaining long-term rental supply" to necessarily include retaining housing supply, overall. See [here](#) for more discussion.

⁷ In order to achieve greater equity, where this program seeks to enable the potential for added revenue, it does so for both homeowners *and* tenants/renters.

1. **Clarity of regulations and process** – members of the public are able to quickly understand the regulations, why they were chosen, and how to legitimately operate RGA in the Town of Gibsons.
2. **High level of initial voluntary compliance** – Gibsons achieves a high level of voluntary compliance within the early months of implementation. Voluntary compliance means operators either secure a valid business licence for their listing(s), remove their listing(s) from online platforms, or change the nature of their listing(s) to offers of formal residential tenancy of 30 days or more. For the purposes of this goal, a high level of voluntary compliance is considered to be above 80%.
3. **High level of ongoing compliance** – Gibsons achieves a high level of ongoing compliance once the initial grace period has expired. Ongoing compliance means owners secure a business licence for permissible units, abide by licencing requirements, and refrain from advertising or operating illegal units. Measurement will focus on the percentage of observed RGA listings that include a valid business licence number, subtracting any listings that have recently been found to be in non-compliance with any of this policy's specific regulations (targeting 90% or higher).
4. **Ease of enforcement** – the workload required of bylaw staff for ongoing enforcement is manageable, and supported by (a) allocating a portion of a new full-time bylaw position to RGA policy enforcement, and/or (b) utilising cost-effective third party support.
5. **Cost recovery** – Gibsons is able to recover 100% of the following costs:
 - a. Program development
 - b. Initial implementation of regulations
 - c. Ongoing enforcement of regulations
 - d. Supplemental planning costs⁸

⁸ In particular, those associated with designing and implementing the desired transition – explained throughout this policy document – away from residential guest accommodation and towards new and upgraded commercial guest accommodation.

General Approach

As laid out in [Appendix A](#), designing an RGA/short-term rental regulatory program inevitably requires local governments to resolve key trade-offs, deciding between approaches that range from generally restrictive to generally permissive.

To best advance the Town of Gibsons' primary goals (including the #1 goal of protecting long-term rental housing⁹ and the #2 goal of keeping the scale of business appropriate to residential neighbourhoods), **a generally-restrictive approach has been chosen**, in line with other BC communities prioritizing housing availability and affordability.¹⁰

Within this generally-restrictive framework, *limited and in some cases temporary permissions* will still be granted so that the Town's secondary goals can be advanced, including additional revenue for residents, and ensuring accommodation options for visitors. However, these limited permissions have been designed in such a way as to avoid seriously or permanently compromising the Town's primary goals.

For example, to advance Council's secondary (#3) goal of additional household revenue, full-time residents will be granted permission to use their principal residence¹¹ for guest accommodation. However, by virtue of this permission being limited to principal residences, and by adding in both intensity limits¹² and accountability measures,¹³ Council's primary goals of housing and neighbourhood character will be protected.

Similarly, to advance Council's secondary (#4) goal of ensuring sufficient accommodation options, *temporary permission* will be granted to a limited number of non-principal residences for use as guest accommodation, to help avoid or minimise the shock of this otherwise-restrictive program to the Town's tourism sector. This will mean fewer housing

⁹ This is tied to the protection of the Town's housing stock overall, and inclusive of the interlinked issues of availability (supply) and affordability (see further discussion in footnote 2); informed by the [Sunshine Coast Regional Housing Needs Assessment Report](#) and information provided by the Town's consultant in a Sept. 28, 2021 staff report "[Short-Term Rental Regulations – Goal Prioritization and Review](#)", presented and discussed during a Sept. 28, 2021 special [Committee of the Whole meeting](#).

¹⁰ Including neighbouring communities like Squamish and Vancouver.

¹¹ This is one of those terms whose definition can vary widely from one jurisdiction to the next. In this program, "principal residence" will mean a single dwelling unit lived in for at least 9 months of the year. This definition is discussed in more detail in the [Major Components](#) section of this policy.

¹² Discussed more, [below](#).

¹³ Described in detail in the "Main Components" and "Additional Details" sections.

units returned to the market while the permissions are in effect (compromising Council's #1 goal). However, the idea is for *all* of these temporary permissions to expire after a maximum of 5 years - returning many of these units to the housing market¹⁴ - and over which time the intention is to have facilitated the construction of a sufficient number and quality of purpose-built commercial guest accommodation to catch up to the tourism need. In other words, this approach takes the long view and aims to dissolve the problematic trade-off between accommodation and housing altogether.

An overall advantage of proceeding with a generally-restrictive approach is that it is relatively straightforward to relax regulations at some future date, for example if rental housing concerns ease due to the Town achieving persistently high rental vacancy rates, rental diversity, and affordability. By contrast, due to legislative constraints, it is more difficult to “walk back” an initial, generally-permissive approach.

The utilization of temporary permissions (described in more detail, below) will introduce natural check-in points after this program's implementation. At these moments, the policy can be reconsidered in light of experience, new data or priorities, and modified as desired.

Major Components

Gibsons' Residential Guest Accommodation Policy can be thought of as having four main components:

- 1. Clarified terminology**
- 2. A housing-centric classification system**
- 3. Allowing Principal Residence RGA in all zones, with intensity limits**
- 4. A phased-in prohibition on Non-Principal Residence RGA**

1. Clarified terminology

The term “short-term rental” is one of the most common ways to refer to the use of residential dwellings for temporary accommodation by paying guests. Despite its common usage, this term has several drawbacks.¹⁵ To avoid these drawbacks, Gibsons' program will instead use the term “residential guest accommodation,” and contrast it with “commercial

¹⁴ Some units may be left vacant or otherwise used for non-residential purposes, but over time the incentives will begin stacking in favour of residential use, overall.

¹⁵ See discussion in Appendix A.

guest accommodation” and “residential tenancy.” Each of these terms will constitute a distinct land use, as outlined below:

- **“Commercial guest accommodation”** – involving purpose-built commercial accommodation units (e.g. rooms and suites) in hotels, motels, hostels, dormitories, etc. This will replace the current “tourist accommodation” term in Gibsons’ bylaws.
- **“Residential guest accommodation”** – involving residential dwelling units used for the temporary accommodation of paying guests, including traditional B&Bs and Lodging Houses, and modern listings on platforms like Airbnb and VRBO.
- **“Residential tenancy”** – involving residential dwelling units used to conduct a formal tenancy agreement, as defined and governed by BC’s *Residential Tenancy Act*, including both fixed-term and month-to-month leases.

Many local governments currently use a common but somewhat arbitrary and problematic 30-day cutoff for defining a “short-term rental” land use. Gibsons’ program will instead classify all paid occupancy of a dwelling unit that doesn’t involve a residential tenancy agreement as residential guest accommodation, regardless of the duration of stay. The rationale for this approach is discussed further in [Appendix A](#).

2. A housing-centric classification system

Instead of earlier proposals that would classify short-term rentals/RGA based on whether or not they were “hosted” or “unhosted” (i.e. whether or not the operator lived and was present somewhere on the lot during the guest stay), Gibsons will adopt a housing-centric classification system that splits RGA into those taking place in so-called:

- **Principal Residences;** or
- **Non-Principal Residences.**

The term “principal residence” can be confusing because its meaning and application change from one local government to the next, the provincial and federal governments have their own definitions (related to taxes, etc.), and people often have their own intuitive idea about what it should mean.

In Gibsons, a **principal residence** will mean a dwelling unit where a person lives at least nine months in a calendar year and conducts their daily affairs, including, without

limitation, paying bills and receiving mail, and is the dwelling unit with the residential address used on documentation related to billing, identification, taxation and insurance purposes, including, without limitation, income tax returns, Medical Services Plan documentation, driver's licences, personal identification, and vehicle registration.

For the purposes of operating RGA, a person cannot have more than one principal residence, a principal residence cannot include any other suites/dwelling units on the same property, and each suite of rooms that could structurally function as a separate dwelling unit will be considered a separate dwelling unit.¹⁶

The nine-month threshold is intended to clearly distinguish full-time year-round residents of Gibsons from those living in the community part-time, in order to (a) concentrate the financial benefits of RGA (re: Gibsons' #3 goal) in the hands of full-time residents, and (b) dovetail with regulations intended to limit the intensity of entire-unit principal residence RGA to 3 months per calendar year (see Table 1, below)

A **non-principal residence** will mean any unit that a person owns or rents but where they do not live at least nine months in a calendar year or conduct their daily affairs (these units will often take the form of secondary suites, lock-off suites, garden suites, summer homes, investment properties, etc.).

The overall intent of this classification system is to clearly distinguish between separate, potential long-term homes, in order to set up specific regulations that best advance Council's #1 goal of protecting long-term rental housing.

3. Allow Principal Residence RGA in all zones, with intensity limits

This policy will allow owners¹⁷ and tenants¹⁸ of any dwelling type, and in any zone, to use their principal residence for two subtypes of RGA:

- **Principal Residence RGA (partial unit)** – up to two bedrooms in the operator's principal residence can be rented year-round while the operator is present in the

¹⁶ For additional clarity and discussion refer to [Appendix C](#) as well as the visual examples included in the accompanying [Policy Summary](#).

¹⁷ With the approval of their Strata if applicable.

¹⁸ With the approval of their landlord.

dwelling unit, similar to traditional B&Bs; and

- **Principal Residence RGA (entire unit)** – the operator’s entire principal residence can be rented while they are away (e.g. on vacation, extended work trips, or living elsewhere at the time), for a maximum of 3 consecutive calendar months in a calendar year.

Both subtypes fall under what is often referred to in the short-term rental sector as “true homesharing,” because operators are sharing a suite of rooms (whole or in part) that make up their actual, primary home.

The intent of this policy component is to provide an avenue to advance Council’s *secondary goals* of “responding to the needs of homeowners who wish to have added revenue”¹⁹ and “providing tourists with accommodation options...” but without compromising Council’s *primary goals* of “retaining long-term rental supply”²⁰ and “keeping the scale of business appropriate to residential neighbourhoods.” By definition none of these units would be legally operated on a purely commercial basis; every unit would be someone’s primary home.

The intent of allowing Principal Residence RGA in *all zones* and in *all dwelling types* is (a) to advance equitable access to the income-earning potential of RGA for residents (re: Council’s #3 goal),²¹ and (b) to maximize the diversity of accommodation options provided via this type of RGA (re: Council’s #4 goal).

One consequence of allowing Principal Residence RGA in all zones and dwelling types is that for some zones and dwelling types (e.g. apartments, condos, townhouses), guest use may be more obvious and therefore more impactful to neighbours due to physical proximity and use of shared spaces like lobbies, elevators, etc. However, nothing in this policy affects the authority of strata corporations or landlords to prohibit or restrict RGA in response to any associated concerns.

¹⁹ While also extending this benefit to local renters who have their landlord’s permission, thereby increasing the degree of equity achieved by this policy.

²⁰ The caveat here is that RGA utilizing shared or private rooms might lead to some loss of long-term *room rentals* in Gibsons; however, because this type of rental was not raised as a specific/major concern during Council deliberations, these regulations leave room for this type of activity.

²¹ Ensuring both renters and owners, and owners of variably-priced units, can benefit from the policy.

Intensity Limits

Principal Residence RGA (partial unit) will be allowed throughout the entire year. The intent here – in addition to the goals stated in the preceding section – is to allow for the operation of Bed and Breakfast-type businesses under a newly-unified system.²² This type of RGA will be limited to no more than two bedrooms at a time in order to be roughly consistent with current intensity limits on Bed & Breakfasts.²³

Principal Residence RGA (entire unit) will be restricted to no more than three pre-registered,²⁴ consecutive²⁵ calendar months in any given calendar year. The intent of this “month cap” intensity limit²⁶ – combined with the requirement to live in a unit for 9 months of the year in order for it to count as one’s principal residence – is to: (a) concentrate the revenue benefits of this subtype of RGA in the hands of residents who live in Gibsons for the vast majority of the year, and (b) help mitigate several specific concerns of Council pertaining to this subtype of RGA. Table 1 summarizes these concerns, and outlines how the regulations intend to address each.

Table 1: Concerns related to Principal Residence RGA (entire unit), and planned mitigations

²² Any existing, licenced Bed and Breakfasts that also incorporate non-principal residence dwelling units into their operation will be allowed to continue operating those units via the non-conforming provisions of the *Local Government Act*.

²³ Currently, B&Bs are limited to 1-2 “sleeping units” (2-4 beds), depending on the zone. Assuming the typical residential bedroom can accommodate one larger bed or two smaller (e.g. twin) beds, the 2-bedroom limit in this policy – applied across all zones – can be thought of as *roughly equivalent* to the current regulations. This policy and its associated bylaw amendments use a new term of “bedroom” (replacing “sleeping units”) because it is easier to interpret and enforce.

²⁴ Months will be chosen by the operator and registered via business licence. The intent behind pre-registration is to aid in compliance/enforcement efforts.

²⁵ Requiring the months to be consecutive is intended to increase feasibility of enforcement. It will decrease instances of operators carrying on an STR use in an unpermitted month by beginning a booking *at the end* of a permitted month. The consequence of this enforcement-oriented provision is less flexibility for operators (even as many will choose to offer sequential months anyway e.g. during summer). This detail can be revisited during the 2 and 4 year reviews, after Gibsons has gained some experience enforcing the initial program.

²⁶ One of the most intuitive ways to limit the intensity of STR/RGA use is via a so-called “night cap” that seeks to limit the total number of nights a unit can be rented in any given month or year. The big problem with night caps is that, until platforms are required to share specific enabling data with governments, they can become nearly-impossible to enforce. However, enforcing a month cap is more feasible, especially if the months are pre-registered and consecutive.

Nature of concern	Mitigations
<p>Mutually-agreed, sequential fixed-term leases of e.g. 9-10 months – with the owner occupying the unit during the summer – are common in Gibsons and an important, if insecure and disruptive, form of long-term rental. There is a concern that, under the regulations, some of these owners may choose to claim the associated units as Principal Residences and seek to use them as RGA while away, displacing the long-term tenants who would otherwise live there for the majority of the year.</p>	<ul style="list-style-type: none"> ● In order to obtain a business licence for Principal Residence RGA (entire unit), the owner would have to attest to living in the unit for a minimum of 9 months in the associated year. This would preclude all owners involved in this kind of summer-use, sequential fixed-term lease situation. ● Principal Residence RGA (entire unit) will be subject to an intensity limit of no more than 3 pre-registered and consecutive calendar months in any given year. ● The above two mitigations will mean that for the scenario of concern to unfold, an owner will have (a) had to falsely attest to living in the unit for the minimum number of months per year, and (b) forego 9 or more months of long-term rental income in favour of a maximum of 3 months of RGA income during off-peak months (likely a losing financial proposition).
<p>Even if an RGA unit is someone’s Principal Residence (primary home), and even if no long-term tenants are being displaced, if the unit is operated as an entire dwelling RGA for a significant portion of the year, neighbourhood character may be impacted due to the frequent absence of the local resident and their replacement by a series of guests who are unknown to neighbours.</p>	<ul style="list-style-type: none"> ● Principal Residence RGA (entire unit) will be subject to an intensity limit of no more than 3 pre-registered and consecutive calendar months in any given year. ● This kind of “month cap” intensity limit on RGA use of Principal Residences should minimize neighbourhood character impacts, while still (a) allowing residents – including both owners and tenants with landlord permission – to earn some added revenue, and (b) providing additional accommodation options, per Council’s secondary goals.
<p>One of the main reasons Council had, in their earlier deliberations on this issue, focused on “hosted” short-term rental units was their desire for an onsite resident to be present and available to address any disturbances by guests. Entire unit short-term rentals/RGA, where the operator is not present, will lack this kind of onsite responsiveness and accountability and there is therefore a concern that guest disturbances</p>	<ul style="list-style-type: none"> ● Principal Residence RGA (entire unit) will be subject to an intensity limit of no more than 3 pre-registered and consecutive calendar months in any given year. ● Operators will be required to list a “designated responsible person” on their business licence application for this type of RGA. The designated responsible person (can be a property management company) must attend the unit within 45 minutes of receiving a complaint and resolve a

<p>(frequency, severity) will increase and that the response to these disturbances will be slower and/or less effective.</p>	<p>complaint within 24 hours of being contacted by the Town. Inadequate response to complaints can be grounds for fines or other enforcement action.</p> <ul style="list-style-type: none"> • The above measures, combined with (a) the fact that the unit in question is the operator’s primary home and (b) the built-in accountability mechanisms of online STR/RGA platforms (host and guest reviews) should altogether adequately address Council’s concerns pertaining to guest disturbances. However, additional measures could be contemplated if needed once the Town has had an opportunity to assess the effectiveness of the policy.
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While introducing a degree of complexity into the regulations, permitting **Principal Residence RGA (entire unit)** across all of Gibsons, in the month-capped fashion described above, is also intended to generate additional business licence revenue to aid in cost-recovery of the whole program. Experience will help determine whether this additional revenue (and the additional advancement of Council’s secondary goals) is worth the added complexity, in Gibsons’ context.

4. A phased-in prohibition on Non-Principal Residence RGA

To best advance Gibsons’ #1 goal for this policy of protecting long-term rental housing, and to protect Gibsons’ housing stock overall,²⁷ Non-Principal Residence RGA will eventually be prohibited in all zones (aimed at eliminating the loss of entire homes to RGA).²⁸

However, in recognition of (a) the strong demand for RGA options in Gibsons;²⁹ (b) the relatively low star rating of current commercial accommodation providers; (c) the current absence of alternative commercial guest accommodation options in priority areas (i.e. the Harbour Area); and (d) in advancement of Gibsons’ #4 goal for this policy of ensuring sufficient accommodation options, **the Town will issue a limited number of 2-year Temporary Use Permits (TUPs) for year-round, entire-unit Non-Principal Residence**

²⁷ As discussed in footnote 6, the rental and ownership markets are inextricably linked.
²⁸ Permissions for Principal Residence RGA may continue to lead to some loss of long-term rental rooms.
²⁹ Data provided by AirDNA for 2021 show occupancy rates for short-term rentals/RGA that range from ~67% in the winter to >90% in the summer months (these rates are quite high, i.e. there is significant current demand for RGA in Gibsons).

RGA, prioritized within the Harbour Area Plan and Lower Gibsons.³⁰ As per the *Local Government Act*, these permits may be renewed once, for a maximum of three additional years (5 years total if an initial 2-year term is adopted).

These temporary permits will be issued with the understanding that it is the Town's intention to facilitate the building of enough purpose-built commercial guest accommodation to completely eliminate the need for Non-Principal Residence RGA over the next 2-5 years; in so doing dissolving the current problematic trade-off between guest accommodation and long-term housing.

For more detailed information on this policy's use of TUPs, please refer to the dedicated section on [Temporary Use Permits](#).

Evaluation and Evolution

The incorporation of Temporary Use Permits into this policy creates natural milestones for evaluation and evolution.

This policy is designed with up to three such milestones in mind: a 2-year milestone, a 3-5 year milestone (if any TUPs are renewed), and a final milestone occurring 1 year after the final TUPs have expired.

The first milestone is intended to coincide with the expiration of an initial batch of 2-year TUPs for Non-Principal Residence RGA. At this time, an evaluation will be prepared that focuses on assessing progress towards building new and upgraded commercial guest accommodation, and includes data on policy compliance, complaints and operational details. Based on this evaluation, Council can decide (a) whether to renew a number of TUPs for a final term or to immediately phase them out, and (b) whether to make any additional changes to the policy based on experience gained over the first two years of implementation.

The second milestone is intended to coincide with the final expiry of any renewed TUPs (if these had not already been phased out after the first two years). At this time, a second evaluation will be prepared that is intended to be of similar nature to the first. Council can

³⁰ As illustrated on pp. 2, 3 and 9 of the [Harbour Area Plan](#), which forms part of the Town of Gibsons' [Official Community Plan](#).

then decide if there are any changes they would like to make as the prohibition on Non-Principal Residence RGA takes full effect.

The third milestone is intended to occur one year after all TUPs have expired (i.e. 3-6 years after initial implementation). At this time, a housing-focused evaluation will be prepared that includes an estimate of the number of former RGA units that have been returned to Gibsons' long-term rental housing stock, to assess progress towards Gibsons' #1 goal for these regulations. A key component of this housing-focused evaluation will be physical site visits and interviews with current and former RGA operators to ground-truth how units are being used. This kind of unit-by-unit assessment is intended to solve key STR/RGA evaluation challenges currently being experienced by other communities.

If at any time Gibsons is able to achieve and sustain high rental vacancy rates, diversity and affordability, or if Council's goals or priorities change, the generally-restrictive approach to RGA described in this policy could evolve to something more permissive. More permissive approaches might include permitting a number of Non-Principal Residence RGA over the long-term (e.g. under a quota system or more broadly by allowing "hosted" or "same lot STRs" as originally envisaged) and/or by relaxing intensity limits on Principal Residence RGA.

A detailed evaluation plan can be developed following Council's approval of this policy, and will align with the milestones described above.

Timing

The following is subject to change based on the timing of Council review and approval.

The regulations described in this policy are currently intended to come into force summer/fall, 2022. At this time, a 5-month grace period will begin during which RGA operators will be asked to:

- Learn about the regulations;
- Apply for a business licence, and temporary use permit if applicable; OR
- Remove their RGA listing from all online platforms if it is not permitted by the regulations/if a business licence is not granted.

The application window for Temporary Use Permits will close September 30, 2022.

In winter, 2022 Council will review all Temporary Use Permit applications at the same time, and successful applicants will be notified before the end of the month.

Active enforcement will begin on January 1, 2023.

Intersections

The following table outlines how Gibsons’ residential guest accommodation policy aligns with other current plans, priorities, strategies and goals.

Table 2: Alignment of proposed RGA policy with other plans and strategies adopted by the Town of Gibsons

Current plan or strategy	Element	Alignment with STR regulatory approach
Strategic Plan	<p>Advocate for and Facilitate A Range of Housing Types:</p> <ul style="list-style-type: none"> We will actively work toward increasing the supply and range of safe, secure and attainable affordable housing options. 	RGA regulations are designed with “Retaining long-term rental supply” as the #1 goal.
	<p>Plan for Sustainable Growth:</p> <ul style="list-style-type: none"> We will value the unique character of our Town and its neighbourhoods We will create spaces that promote a sense of community and are accessible to all We will support local businesses and foster a diverse economy 	RGA regulations are designed with “Keeping the scale of business appropriate to residential neighbourhoods” as the #2 goal, in service of neighbourhood character, community and accessibility. Regulations will support local businesses/economic diversity through a balance of a housing-first approach with targeted concentration of RGA where tourist accommodation is most needed.
Official Community Plan	<ul style="list-style-type: none"> Policy 11.2.6 is supportive of the ‘sharing economy’ and how to encourage this type of activity. The ‘sharing 	RGA regulations are designed to permit a degree of “true home sharing” involving the operator’s main dwelling unit, while generally

	economy' refers to the sharing of assets such as vehicles, tools, real estate etc. to reduce costs and environmental impact.	restricting more commercial forms of RGA that problematically displace long-term rental units.
	<ul style="list-style-type: none"> Policy 5.6.8 is to 'Increase tourist accommodation within walking distance of the Harbour area'. 	A key strategy of this policy is to facilitate the creation of new and upgraded commercial guest accommodation in the Harbour area over the next 2-5 years. In the meantime, accommodation options in or near the Harbour area will be maintained via a limited number of Temporary Use Permits made available for Non-Principal Residence RGA.
Town of Gibsons Housing Strategy	<ul style="list-style-type: none"> Recommendation 1.5: Expand pre-zoning for infill density in the Davis Road-Poplar Lane corridor to more areas close to the town centre, with restrictions on short-term rentals. Multiple other recommendations pertaining to increasing the supply of affordable/attainable housing. 	<p>Regulations will protect all new housing units for primary use as long-term homes.*</p> <p><i>*Temporary permissions for non-principal residence RGA will only be granted to units with a history of STR use (i.e. by definition this will exclude newly constructed units).</i></p>

Supplemental Initiatives

This policy includes a phased transition away from non-principal residence RGA and towards new and upgraded commercial guest accommodation (hotels, motels, resorts, etc.), with a focus on priority areas such as those identified in the Harbour Area Plan.

At time of writing, there is one commercial accommodation project that could be built in the near-term (the George Hotel). There is an additional project at the application/rezoning stage (the Stonehurst Inn). However, the final construction of these projects is not guaranteed. Additional planning work could help ensure Gibsons is able to attract enough

commercial guest accommodation options over the next few years (including total number of units, diversity, and location) to support this policy's total phase-out of non-principal residence RGA. This supplemental planning work is currently budgeted for cost-recovery as part of the policy's [fee structure](#).

Additional supplemental planning work could include:

- **More accurate monitoring of long-term rental vacancy rates, rental affordability, and rental diversity in Gibsons.** In the current context of incomplete or unavailable datasets from e.g. the Canadian Mortgage and Housing Corporation, Gibsons could choose to dedicate resources to identifying methodologies, or enter into partnerships with nonprofit societies (such as the Sunshine Coast Affordable Housing Society), for more accurately assessing the state of its local rental housing stock. Doing so would aid in the measurement of progress towards Gibsons' Housing Strategy writ large, and would help identify future circumstances (e.g. consistently high vacancy rates, unit diversity and affordability) that might warrant a reconsideration of the generally-restrictive nature of this RGA policy.
- **An incentivization policy for long-term rentals.** Council deliberations on STR/RGA noted that, given the #1 goal of protecting long-term rental housing, it would be helpful to have a dedicated rental incentivization program to serve as the "carrot" accompanying the "stick" of this generally-restrictive RGA policy. Gibsons could choose to dedicate resources to developing such a program over the coming months and years.
- **Revisit current mixed-use commercial zoning permissions.** For example, to separate tourist accommodation/commercial guest accommodation uses from multi-family residential uses.

Earlier Work

This policy builds on previous work. In 2019, community engagement activities were carried out in order to understand the public's opinion on short-term rentals. These activities included four 2-hour community dialogues (with 21 participants) and a survey that received 91 responses. Informed by these engagement activities, Council set four goals for Gibsons' STR policy and directed staff to prepare associated bylaw amendments that restricted

STRs/RGA to units run by residents who lived on the same lot (“hosted STRs”). The goals for STR regulation were at that time outlined as follows:

- Responding to the needs of homeowners who wish to have added revenue
- Providing tourists with accommodation options for staying in and visiting Gibsons
- Keeping the scale of business appropriate to residential neighbourhoods
- Retaining the long-term rental supply in Gibsons

The bylaws were given 1st and 2nd readings on June 24, 2020 and a public hearing started on July 14 and carried over to July 21, 2020. Following the public hearing Council requested a report on the implications of also allowing RGA where a resident does not live on the property (“unhosted STRs”).

On September 28, 2021, a report was presented to the Committee of the Whole, and Third Space Planning facilitated a 2.5 hour goal-prioritization workshop, where trade-offs were discussed and goals were reconsidered and prioritized, including in light of the information received by Council in the Sunshine Coast Regional Housing Needs Assessment Report. Council reprioritized the four, pre-existing STR goals in the following new order, listed from highest priority to lowest priority:

Primary Goals:

1. Retaining long-term rental supply in Gibsons
2. Keeping the scale of business appropriate to residential neighbourhoods

Secondary Goals:

3. Responding to the needs of homeowners who wish to have added revenue
4. Providing tourists with accommodation options for staying in and visiting Gibsons

In light of this newly-clarified and prioritized list of goals, many elements of Gibsons’ previously-contemplated regulatory approach were deemed no longer appropriate.

This policy therefore reflects a redesign that best advances Council’s current goals.

Part II – Additional Details

This section of the policy goes into further detail on specific topics.

Who can Operate RGA

Only individuals (not companies) will be allowed to operate RGA. Companies can still help with things like maintenance and managing complaints, but it is individual operators who must hold the RGA business licence, whose name must appear in RGA advertisements and listings (if applicable), and who are ultimately responsible for ensuring RGA use complies with Gibsons' regulations.

This condition is intended to (a) increase operator accountability, (b) avoid potential enforcement challenges associated with opaque corporate ownership and operational structures, and (c) concentrate the benefits of permitted forms of RGA in the hands of local residents.

Limitations on Licencing

In addition to any business licences granted for non-principal residence RGA (in association with Temporary Use Permits), an individual will be able to hold a maximum of two business licences for principal residence RGA (one for each of Entire Unit and Partial Unit subtypes), which must be for the same dwelling unit. This licencing limit flows – by definition – from this policy's long-term restriction of RGA to principal residences. Stating it explicitly makes enforcement of the overall policy somewhat easier.

In order to avoid problematic RGA operations, the Town's Licence Inspector may refuse to grant a licence for RGA if the applicant has a history of bylaw offences or unpaid fines.

Because the nature of RGA businesses and compliance considerations are so unit-specific, an individual will not be allowed to transfer an RGA licence to another unit or property (they will have to reapply).

Applying for a Business Licence

Three types of annual business licences will be available for RGA, including one for each of the subtypes covered by the policy:

- **Principal Residence RGA (entire unit)** – limited to 3 calendar months in a calendar year.
- **Principal Residence RGA (partial unit)** – permitted year-round but limited to no more than 2 bedrooms.
- **Non-Principal Residence RGA** – permitted in association with a limited number of Temporary Use Permits ([as described elsewhere](#)).

Operators will require a separate business licence for each subtype of RGA that they wish to operate.

All business licence applications will need to include the following supplementary information:

- Proof of Principal Residence (government ID and other proof described below)
- Copy of property title (if you own the unit)
- Strata Consent Form (if applicable)
- Owner/Landlord Consent Form (if applicable)
- Parking Plan
- Guest Safety Attestation
- Fire Safety Plan

A complete package of the necessary forms is available [here](#), and the associated requirements are included in the amended Business Licence bylaw.

Gibsons' bylaw staff will perform a site visit before granting a business licence for every RGA, in order to verify the submitted information and answer any questions.

These site visits will not involve a building inspector and therefore the scope of the inspection will not include a formal assessment of whether the associated unit(s) are "legal suites" (e.g. in compliance with the BC building code), though egregious circumstances may

be noted by the Licence Inspector for follow-up. This approach is designed to provide a path for RGA approval, including for renter operators,³¹ without unintentionally triggering a loss of informal (unpermitted/non-conforming) long-term rental housing, which would be contrary to this policy's #1 goal.

Neighbourhood Disturbances

Gibsons' policy will mitigate disturbances arising from guest use of RGA³² in four main ways, the first two of which have already been described:

1. Intensity Limits

- Operators of **Principal Residence RGA (entire unit)** will be limited to 3 consecutive calendar months of operation in a calendar year.
- Operators of **Principal Residence RGA (partial unit)** will be limited to no more than 2 bedrooms used for RGA at any one time.

2. Density Limits

- The policy will eventually prohibit **Non-Principal Residence RGA** (arguably the least-accountable form of RGA due to the fact that the operator does not primarily live in the unit). However, during the period of time where a limited number of these units will be allowed via [Temporary Use Permit](#), this will amount to a community-wide density limit on this type of RGA.

3. Designated Responsible Person

Operators of all RGA will be required, in their business licence application, to assign a "Designated Responsible Person."

For **partial-unit RGA** the responsible person will need to be the operator themselves.

For **entire-unit RGA** the responsible person can be anyone over the age of 18, including an employee of a property management company.

The Designated Responsible Person must be available 24/7 during guest stays, must attend the RGA unit within 45 minutes of receiving a complaint, and must resolve all complaints within 24 hours of being notified by the Town. They will be contacted during the review of

³¹ Providing for the participation of renter operators was deemed important to advance equity.

³² Per Council's #2 goal of "Keeping the scale of business appropriate to residential neighbourhoods"

business licence applications to confirm their agreement to act in this capacity.

4. Platform-Mediated Accountability

Platform-mediated RGA has built-in accountability in the form of host and guest reviews, which helps discourage problematic behaviour by all parties.

However, if an RGA operator is found to be negligent in addressing guest disturbances and complaints they may be subject to fines, revocation of their business licence, and/or future denial of an RGA business licence based on their past record (see [Fines](#) for more information).

Neighbour Notification

Neighbours within 50 meters of **Non-Principal Residence RGA** will be notified of the intended use as part of the standard public comment period for the associated Temporary Use Permits.

This policy will not require neighbour notification for **Principal Residence RGA**. The rationale for this is as follows:

- Including a formal requirement for Operators to deliver neighbour notifications would create an associated obligation on the part of the Town to continually verify or occasionally audit compliance with this condition, requiring additional resources.
- Having the Town deliver these notifications would similarly require additional resources.
- Neighbours who are not notified (e.g. not immediately adjacent to the property) can still contact the Town at any time if they would like to register a property-related complaint.
- Eliminating neighbour notifications helps protect the safety and privacy of Principal Residence RGA operators, a topic that is currently before the courts.³³

³³As outlined [here](#).

Advertising

In order to simplify enforcement of the overall policy, marketing or offering for rent RGA, whether in physical advertisements or online, will not be permitted unless the operator holds a valid Town business licence, and the licence number must be included in all advertisements.

Operation and Maintenance

Operators will be required to conspicuously display copies of the following information in their unit at all times during guest stays:

- Business licence
- Parking Plan
- Fire Safety Plan
- Contact information for themselves and the Designated Responsible Person (if different), Town of Gibsons Bylaw Enforcement, emergency 911, and non-emergency contact information for the Gibsons RCMP and Gibsons Volunteer Fire Department.

Operators will also be required to maintain required safety equipment and measures as outlined in their [Guest Safety Attestation](#).

Records

Operators must keep a record of the number of days their RGA is booked, along with maintenance records for smoke alarms, fire extinguishers and any carbon monoxide detectors.

The Town Licence Inspector may request these records and/or any other documentation they deem necessary in order to demonstrate compliance with this policy.

Parking

Impacts to street parking are a common concern related to short-term rentals/RGA. [Appendix E](#) contains a discussion of why it is a particularly challenging issue to address.

Gibsons' policy will take a practical, flexible approach to addressing those challenges by asking operators to submit an RGA **Parking Plan** that is tailored to the individual circumstances of their unit. The overall intention is to avoid indirectly prohibiting residents from operating RGA solely on the basis of off-street parking availability, but to nonetheless require operators to carefully plan for guest parking, and to hold operators accountable to their plan.

- In these Parking Plans, operators will be required to show where they will direct all guest vehicles to park. The Parking Plan must be able to accommodate 1 vehicle per bedroom licenced as RGA, up to a maximum requirement of four parking spaces,³⁴ as well as all vehicles owned by the operator that will normally be present during guest stays.
- However, instead of requiring all of these parking spaces to be dedicated off-street spaces, the Parking Plans can incorporate: (a) the operator's own private parking spaces, (b) tandem off-street parking,³⁵ (c) private visitor parking (the applicable owner or Strata will need to consent), and (d) as a last resort, public parking adjacent to the property.
- The "as a last resort" qualification means that RGA Parking Plans for units with ample off-street parking (e.g. single family-dwelling units) must utilize those spaces first. Operators that end up including public parking spaces in their Parking Plans can be viewed as analogous to any other business that relies to some degree on the availability of public parking.

This customized approach to RGA parking, as documented for each operator in dedicated Parking Plans, will be required by the Zoning bylaw. Operators will also be required to post the Parking Plan and ensure they make the indicated off-street parking spaces available to guests.

³⁴ The maximum requirement envisions an 4+ bedroom house rented in its entirety by a multi-household group. It is expected that even with rentals of larger houses (exceeding 4 bedrooms), the number of guest vehicles will rarely exceed 4.

³⁵ Tandem parking is where two vehicles are parked front to back in the same driveway/lane/large parking space.

Insurance

The business licence application for RGA will include a standard indemnity clause shielding the Town from any liability associated with RGA operations. While operators will be encouraged to seek professional insurance advice, the RGA policy will not include a requirement for RGA operators to provide proof of insurance. The rationale for this is as follows:

- Industry experts and municipal lawyers spoken to by this policy's authors suggest that an insurance requirement may create an administrative burden to review or audit without appreciable benefit.
- RGA is operated as a private for-profit business and operators should assess their own risks and insurance requirements with the assistance of professional licenced brokers.
- Most platforms include free property damage and liability insurance for hosts. For example, Airbnb provides \$1 million for each type.
- According to the experts spoken to by this policy's authors, municipalities do not have an exposure to third party liability claims for bodily injury or property damage arising out of the business licensing process. However, as already noted and as a precaution, Gibsons will include a standard indemnity clause within the business licence application for RGAs.

Guest Safety

As part of their business licence application, operators will be required to complete a [Guest Safety Attestation](#) that requires them to confirm compliance with a list of basic safety measures including the installation and maintenance of smoke alarms, fire extinguishers, carbon monoxide detectors, and unobstructed access to fire exits, the locations of all of which are to be clearly indicated on a Fire Safety Plan conspicuously displayed in the unit. These safety conditions will form part of the RGA section in the Business Licence bylaw.

Fees and Cost Recovery

One of the [operational goals](#) of this RGA policy is 100% cost-recovery. This section projects the first two years of RGA program implementation and uses rough estimates³⁶ of total RGA program costs (including program development costs), and the anticipated number of licenced RGA units in order to identify fee levels that are consistent with this goal.

Program Costs

As detailed in Table 3, total RGA program costs leading up to and during the first two years of implementation are estimated at ~\$300,000.

Table 3: Rough estimate of RGA program design, implementation and evaluation costs for the Town of Gibsons

Description	Costs	Notes
2021/2022 Comprehensive RGA program design <i>(including comprehensive policy document, bylaws, public communication materials and enforcement plan and resources)</i>	\$40,000	High confidence (work has been contracted)
Year 1 & 2 implementation <i>(including TUP process, public education, initial business licence application reviews, and intensified proactive enforcement to establish high levels of initial compliance)</i>	\$185,000	Assumes the involvement of bylaw services, planning, and temporary enforcement contractor support.
Initial 2-Year program evaluation	\$15,000	Includes a rough estimate of the cost of site visits to collect information on current and former RGA units, to compile data and write up comprehensive program evaluation.
Accommodation transition planning <i>(to facilitate the creation of new and upgraded commercial guest accommodation)</i>	\$60,000	Rough, conservative estimate of a comprehensive planning project to facilitate the creation of new/upgraded commercial guest accommodation (including policy development, outreach and development planning support).

³⁶ Actual costs could vary significantly e.g. due to (a) higher or lower costs for supplemental planning services (once fully-scoped), (b) higher or lower levels of initial voluntary compliance by existing operators, and (c) variations in staff procedural costs. Meanwhile, the actual number of licenced units could vary significantly e.g. due to (a) higher or lower levels of voluntary compliance, and (b) the number of operators who choose to enter or remain in business under the new regulations.

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Number of Licenced Units

Over the course of 2021 the number of active STR rentals in Gibsons listed on Airbnb and VRBO (the two biggest platforms) ranged from a low of 82 (Q1), to a high of 98 (Q3 and Q4).³⁷

However, it is difficult to take this kind of listing data and produce a reliable estimate of how many RGA licences Gibsons might issue over the first two years of policy implementation. Some key variables include:

- The number of existing operators who choose to continue operating under the new system (with its new fees and requirements);
- The number of new operators who enter the business (e.g. encouraged by the presence of a legalized framework for RGA operation); and
- The degree of regulatory compliance achieved over this period.

However, some rough assumptions can be made to produce a working number for the purposes of initial cost-recovery modelling. These assumptions include:

- All fifty³⁸ Temporary Use Permits for Non-Principal Residence RGA that are made available will be taken up in the first year of implementation. This is a reasonable assumption given the strong revenue potential of RGA in Gibsons, though its realization will depend on vigorous public education and early enforcement efforts.³⁹
- A target of at least 30 Principal Residence RGA business licences will be issued annually, corresponding to the approximate difference between the 50 TUP-permitted units, and *the lowest* number of quarterly active rentals observed

³⁷ Source: AirDNA

³⁸ This policy begins with an initial number of 50 Temporary Use Permits, as discussed in the [TUP section](#). This number could change based on Council deliberation on the final policy.

³⁹ According to data from AirDNA, for the 12 month period beginning Feb 17, 2021, 50 STR units in Gibsons earned more than \$20,000 (i.e. \$40,000 extrapolated over a two-year period).

through 2020 and 2021(79).⁴⁰ Here, taking the lowest number of quarterly active rentals is in recognition of the dampening effect new regulations (and associated compliance requirements) are likely to have on RGA activity.

Proposed Fees

Table 4 sets out the proposed application and business licence fees for RGA in order to achieve 100% cost-recovery over the first two years of implementation. Additional rationale for each amount is provided below the table.

Table 4: Application and business licence fees for RGA

Description	Fee Amount
<p>One-time Business Licence application fee</p> <p>Principal Residence (Entire Unit) Principal Residence (Partial Unit)</p> <p><i>*If applications for both Entire Unit and Partial Unit RGA are submitted for the same unit simultaneously, a single fee of \$400 will apply.</i></p>	<p>\$400* \$400*</p>
<p>Temporary Use Permit Fees (only applicable to Non-Principal Residence RGA)</p> <p>Initial application Renewal (if granted)</p>	<p>\$1,500 \$1,000</p>
<p>Business Licence Fees</p> <p>Principal Residence (Entire Unit) Principal Residence (Partial Unit) Non-Principal Residence</p>	<p>\$300 \$300 \$2,000</p>

Additional rationale:

- The one-time application fee of \$400 is intended to cover the significant costs associated with initial verification of details submitted in the RGA business licence application,⁴¹ and includes the cost of a physical site visit by a Town Licence

⁴⁰ Source: AirDNA

⁴¹ Including but not limited to verification of the applicant's Designated Responsible Person, Strata or landlord approval if applicable, feasibility of the applicant's Parking Plan, and Principal Residence claims.

Inspector.

- Gibsons’ annual business licence fees generally range from \$100 to \$300.⁴² Annual business licence fees for both subtypes of Principal Residence RGA will be set at \$300 – the higher end of the current range – to account for the relative complexity of RGA policy enforcement.⁴³
- Business Licence fees for Non-Principal Residence RGA will be set at \$2,000. This unique and higher amount will be combined with the TUP application fee of \$1,500 to create an overall *two-year* total fee for these units of \$5,500. These higher fees can be justified by:
 - The full-time business use of these properties/units;⁴⁴
 - Their higher revenue potential (compared to Principal Residence RGA); and
 - The higher intensity of use (and therefore potential for neighbourhood impacts).

For comparison, the total two-year cost charged to operators of Non-Principal Residence RGA/STR in the District of Squamish is ~\$7,000 and ~\$3,000 in the City of Victoria. As such, the proposed fees for the Town of Gibsons are well within the range of similar fees charged by other jurisdictions.

Combining the rough estimates for the number of licences that might be issued in the first two years with the described fee schedule produces an estimated 2-year total revenue of ~\$305,000 (Table 5), off-setting the estimated two-year program costs of ~\$300,000.

Table 5: Preliminary revenue projections from first two years of RGA fees

Period	Revenue from Non-Principal Residence RGA	Revenue from Principal Residence RGA (total, both types)	Total
First two years	\$275,000	\$30,000	\$305,000

⁴² Exceptions include banks (\$600) and certain businesses where a “per unit” fee (e.g. per vehicle, per parking space, etc.) is charged.

⁴³ For example, the refusal of STR/RGA platforms to share data on bookings requires constant monitoring by staff or third party firms.

⁴⁴ Here, higher annual business licence fees can be used in lieu of the idea of reclassifying the associated properties as business properties for property tax purposes.

	(50 units * \$5,500 total fees)	(30 licences * \$1,000 total fees)	
Third year and thereafter	<i>To be re-assessed in Year 2</i>	<i>To be re-assessed in Year 2</i>	-

The RGA fee schedule is intended to be re-assessed towards the end of Year 2, incorporating real-world data on e.g. staff costs, compliance rates, and licences.

Fines

Fines for non-compliance will be set out in a new schedule to the Notice of Enforcement Bylaw 1125-14, 2022, with total amounts that are consistent with Gibsons’ other prescribed fines.

Taxation

RGA operators will have the following tax obligations:

GST

[Recent changes](#) to federal law mean that, where individual operators are not already registered to collect and remit GST (5%), short-term rental/RGA platforms must now do that themselves for all bookings (regardless of the amount of revenue earned per year on individual units).

While Gibsons’ local policy will move away from the somewhat-arbitrary threshold of 30 days/1 month for defining a short-term rental/RGA land use, the federal government continues to use this threshold for tax purposes, as follows:

- Bookings of less than 1 month are classified as a business activity and are therefore subject to both GST and income tax.
- Bookings longer than 1 month are classified as a rental and are therefore only subject to income tax (not GST).

Operators must be aware of these distinctions and ensure their unique tax obligations are being met.

PST

Starting July, 2022, all short-term rental platforms will be required to collect PST on bookings in BC. Prior to this date, only Airbnb is facilitating the collection of PST.⁴⁵

MRDT

BC currently has an agreement with Airbnb *only* to facilitate the collection of MRDT (set at 2% in the SCRD). Platforms that are located⁴⁶ in BC are also required to collect MRDT on behalf of operators. However, because most platforms are internationally located, collecting MRDT on non-Airbnb bookings will remain the responsibility of individual operators (if they meet [the requirements to do so](#), e.g. > \$2,500 per year in bookings).

Property Tax

Although some municipalities have sought greater and/or clearer authority to reclassify properties used for STR/RGA as business properties for property tax purposes, this policy will not seek to do so. The rationale for this is as follows:

- **Principal Residence RGA** (both subtypes), under this policy, will be considered an accessory use of property whose primary use remains residential.
- The Temporary Use Permits that will be granted for units hosting **Non-Principal Residence RGA** will (a) be temporary, and therefore not constitute a long-term change in primary use of the property, and (b) will be associated with significantly higher [fees](#), negating the need for additional measures (such as property tax reclassification) to achieve cost-recovery goals.

Temporary Use Permits

The [fourth main component](#) of this policy is temporarily permitting – via Temporary Use Permits (TUPs) – a limited number of Non-Principal Residence RGA units until sufficient Commercial Guest Accommodation can be built.

This section provides more detail about how Non-Principal Residence RGA TUPs will be used, including procedural adjustments to streamline their review and approval.

⁴⁵ As per a custom agreement with the Province.

⁴⁶ I.e. are registered to conduct business in BC.

TUPs Explained

TUPs allow a use of land, on a temporary basis, not otherwise permitted in the Town's Zoning Bylaw. As outlined in the Town's Official Community Plan (OCP), TUPs may be issued in all areas of Gibsons. Based on governing legislation, TUPs may be issued for a period of up to three years and renewed once; this is the maximum set out by the *Local Government Act* and municipalities are at liberty to set TUP terms for less than this maximum. TUPs trigger public notification requirements to allow the community to comment on the proposed change of use and any related impacts. Each approved permit will contain specific guidelines and/or conditions of the use of the land and a termination date of the permit. As a condition of issuing the permit, Council may require applicants or owners to post a security bond. Approvals and renewals of TUPs require a Council resolution.

TUP Unit Cap, Term and Renewals

The Town will initially issue a maximum of 50 TUPs for Non-Principal Residence RGA. This corresponds to an estimate of the number of TUPs required to accommodate Gibsons' approximate summer peak in RGA use (refer to [Appendix D](#) for a more detailed discussion of options).

The TUPs will be granted for a period of two years, and phased out to zero thereafter. Council may opt for the phasing to be abrupt (no TUPs renewed after 2 years), or gradual (permitting a number of renewals for a final period of 1-3 years), determined in part by the progress achieved on building new commercial guest accommodation.

As per the nature of TUPs, any subsequent use of the associated dwelling units for RGA beyond the original term shall be prohibited unless the Owner applies for and receives a renewal of the TUP. Renewals will be subject to Council review of the wider RGA program. If future renewals are considered, existing permit holders may begin the renewal process (subject to the renewal fee) within 60 days before the permit expiry to ensure they are able to take advance bookings.

The rationale for this basic approach (50 TUPs granted for a period of 2 years) is as follows.

- It cements the long-term protection of housing (Gibsons' #1 goal) by phasing out the number of Non-Principal Residence TUPs to zero, while:

- Minimizing the short-term impact of the new regulations on tourism-dependent businesses;
 - Giving existing [non-compliant] RGA operators a period of time to adjust their financial and property-related planning to the new regulations;
 - Generating enough TUP-derived revenue to carry out the necessary planning to encourage new, high-quality commercial accommodation in desired areas; and
 - Giving commercial accommodation providers (current and prospective) a degree of certainty – via provincially-legislated limits on TUPs – that the stock of RGA in Gibsons will diminish and therefore justify the required investments in new and/or upgraded facilities.
- The recommended period of two years for the first batch of TUPs aims for a balance between *long enough* to make it worth operators' efforts to apply (taking into account booking lead times of 6+ months), and *short enough* to (a) help spur investment by commercial accommodation operators, and (b) avoid unnecessary delays in achieving progress on housing protection (Council's #1 goal).

Security Bond

RGA TUPs will not require the posting of a security bond. The TUP application fee and business licence fee for Non-Principal Residence RGA (totalling \$3,500), as well as fines for any non-compliance with the Business Licence and Zoning bylaw, are anticipated to cover foreseeable costs that may be incurred by the Town as a result of the temporarily permitted land use.

TUP Evaluation Criteria

Evaluation of TUPs for Non-Principal Residence RGA will consider the following as *minimum* conditions/requirements:

1. No TUPs will be granted for properties that contain a home-based child care facility.
2. A complete RGA TUP application form and its mandatory attachments, along with the required TUP application fee.⁴⁷

⁴⁷ This will be a customized version of the Town's current TUP application form, and will be finalized following Council approval of this policy.

Staff will further consider the following additional evaluation criteria, including but not limited to:

3. STR rental history, including rental frequency: preference will be given for STRs/RGA with the highest rental frequencies (the number of nights rented over the past year), highest occupancy rates (the number of booked days divided by the number of days available for rent over the past year), and highest review ratings.
4. Location: preference will be given to units in Lower Gibsons and the Harbour Area as defined in the Town's Harbour Area Plan/OCP.
5. Any history of complaints at the property.
6. Feedback provided by neighbours during the TUP public comment period.

TUP Conditions

The following conditions will apply to all TUPs for Non-Principal Residence RGA:

1. Applicants must apply for a business licence within 4 weeks of TUP issuance and meet RGA Licensing requirements as set out in Business licence Bylaw 666-11, 2022. If a business licence is not applied for within 4 weeks of TUP issuance, the TUP shall expire.
2. The TUP shall be terminated upon the sale or transfer of the property ownership.
3. The TUP may be revoked by the Town where a permit holder violates the terms and conditions of the permit, or in the case of multiple or egregious complaints respecting the RGA use of the property.

Initial Call for Applications

An initial 8-week call window for TUP applications will be opened following Council approval of this policy. This application window will be accompanied by educational materials and

resources aimed at negating the need for a pre-application meeting with Town staff.⁴⁸

TUP applications received in this initial call window will be processed as one batch to streamline processing. The various processing steps (application review and evaluation, public notification and comment period, and permit consideration) will be completed concurrently for all TUP applications in the batch. Additional call windows will be at Council's direction (e.g. if the TUP unit cap was not reached during the first call for applications).

Application Fees

Existing TUP application and renewal fees (\$1,500 and \$1,000, respectively) will apply as per the Rates, Fees and Charges Bylaw No. 1196, 2014.

Public Notice and Comment Period

After the RGA TUP application window has closed, all applications that meet the minimum requirements will be posted for public comment as per Gibsons' current TUP policy and legislative requirements.

Evaluation and Short-Listing

An initial evaluation of the TUP applications will be completed based on the TUP Evaluation Criteria (minimum requirements). Applications that do not meet the minimum requirements will be refused. Those that meet the minimum requirements will be posted to the Town's [development applications web page](#) and notifications for these shortlisted TUP applications will be posted and sent out to properties within 50 meters of each site,⁴⁹ as required by the *Local Government Act*, and advertised for two consecutive weeks in a local newspaper.

⁴⁸ Gibsons' [general TUP Guide](#) suggests a pre-application meeting as the first step in the TUP application process. However, having such a meeting with every interested RGA TUP applicant would likely be impractical.

⁴⁹ Alternatively, if warranted by the total number of TUP applications, town-wide communications may be sent out.

Non-Dwelling Unit Rentals

For administrative and safety reasons, RGA will not be permitted in boats, RVs, yurts, tents or other structures or vehicles that do not technically qualify as a residential dwelling unit. However, campgrounds for tents and recreational vehicles will remain a permitted land use in applicable zones.⁵⁰

Existing Bed and Breakfasts and Lodging Houses

If existing, licenced Bed and Breakfasts or Lodging Houses incorporate Non-Principal Residence dwelling units into their operations at the time this policy's associated bylaw amendments are approved, these businesses can continue to do so via the non-conforming provisions of the *Local Government Act*.⁵¹ They will not need to apply for Temporary Use Permits (as with other Non-Principal Residence RGA). However, they will need to obtain a new RGA business licence and comply with the associated requirements in the amended business licence bylaw.

Commercial Guest Accommodation

As outlined in the [Clarified Terminology](#) section – and further discussed in [Appendix A](#) – this policy updates the current “tourist accommodation” term in Gibsons’ Zoning Bylaw to “commercial guest accommodation.”

The intent of the terminological change is to make a clearer intuitive distinction between what can be thought of as more “purpose-built” guest accommodation (hotels, motels, hostels, resorts, etc.), and residential guest accommodation taking place in dwelling units/homes.

However, this kind of intuitive distinction becomes more complicated to draw in zones where both residences and “tourist accommodation” are currently permitted. In these zones, a hypothetical scenario can arise where an owner of a single dwelling unit seeks to convert it into tourist accommodation/commercial guest accommodation, as of right. This scenario, if multiplied, could lead to a cascading and unintended loss of residential housing and a more distributed form of guest accommodation that likely departs from the original intent of Gibsons’ current “tourist accommodation” term.

⁵⁰ E.g. Gibsons’ existing “Parks, Recreation and Open Space” Zones.

⁵¹ This “grandfathering” will cease to apply as soon as the business ceases operations in the associated unit(s) for a period of 6 consecutive months.

As such, this policy will define “commercial guest accommodation” as involving a minimum of five contiguous units (self-contained rooms, suites, etc.) with a dedicated lobby. This definition will better match the intuitive understanding of purpose-built, professionally run multi-unit guest accommodation, and will also prevent most instances of unwanted dwelling unit conversion/housing loss in mixed-use zones.

Evolution

This policy seeks to use the first 2-5 years of implementation (during which a number of Non-Principal Residence RGA will be temporarily allowed) to undertake more detailed planning with respect to the future of commercial guest accommodation in Gibsons.

It is anticipated this additional planning will include consideration of the potential for:

- Timeshare properties used for RGA;
- Strata hotels/motels; and
- Other forms of guest accommodation not currently existing in Gibsons and not contemplated within this policy.

Residential Use of Commercial Guest Accommodation

At the time of writing, staff are aware of a number of tourist accommodation/commercial guest accommodation units being used essentially as long-term residences. This policy and its associated bylaw amendments would neither explicitly prohibit this kind of use nor explicitly sanction it.

Enforcement Plan

A detailed and standalone internal Enforcement Plan has been developed in conjunction with this policy.

APPENDICES

APPENDIX A: Terminology

While the term “short-term rental” has become relatively dominant in local government regulations and public discourse, its use has several significant drawbacks, including:

- The “short-term” qualifier leads one to pick an arbitrary number of days (e.g. 30), past which the term ceases to apply, even though the fundamental nature of the land use (temporary accommodation by transient paying guests in a dwelling unit), and its associated impacts (e.g. to housing, neighbourhood character), might remain. For example, a dwelling unit used for 30 consecutive days of accommodation by the same guest is in all other [meaningful] ways going to be the same as the unit being used for 29 days, except for the arbitrary cutoff.
- Picking an arbitrary number of days, as described above, creates a significant grey zone in regulatory frameworks beginning at/after 30 days, but before or in the absence of a residential tenancy agreement. Problems related to this grey zone include:
 - Lack of coverage by local short-term rental regulations, even though impacts to communities might be similar (potential housing loss, neighbourhood character and disturbances).
 - Lack of clear coverage by provincial residential tenancy legislation and its associated protections for involved parties.⁵²
 - In some cases, this grey zone has been exploited by operators who circumvent local regulations by listing their unit for 30+ days (e.g. at a discounted rate) and then coordinating with guests to arrange shorter, actual stays.
- The phrase “short-term rental”, without any prior knowledge of the issue, could sound like it includes commercial accommodation like hotels or motels, where a room is rented for a short period of time.

⁵² Depending on the exact details and circumstances of the accommodation arrangement, a tenancy agreement could be *deemed* to be in place/apply even if no such agreement has been verbally agreed to or signed, but this requires a case-by-case examination.

In Gibsons, the existing terminology intended for commercial operations like hotels and motels is “tourist accommodation.” However, continued use of this term would be problematic because it could easily be conflated with/interpreted to include accommodation in “short-term rentals” (residential dwelling units). Hotels and motels also accommodate more than just “tourists” so the term is already less than ideal.

Updated terminology

This policy includes updates to key terminology to clearly distinguish between the following three land uses:

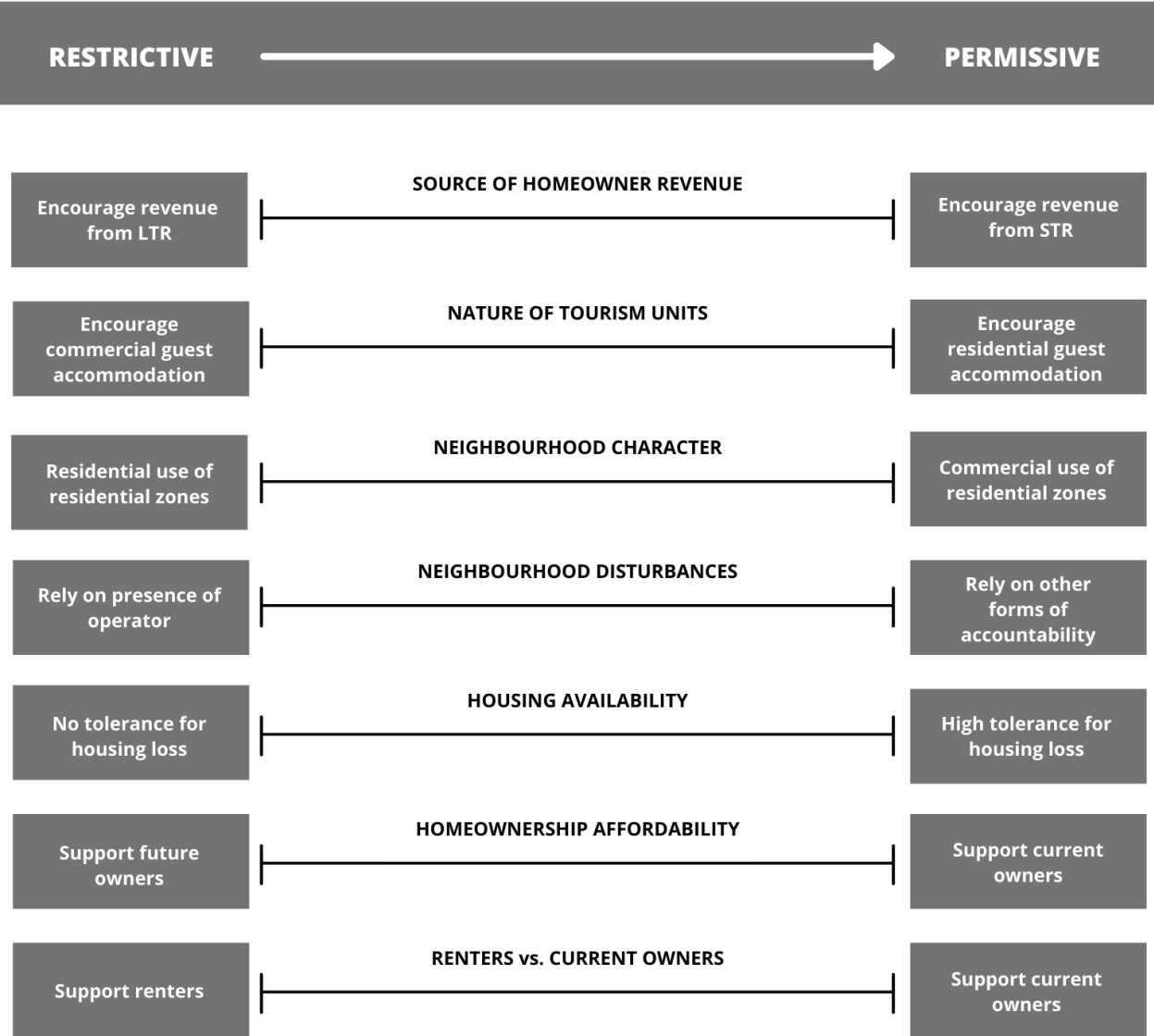
- **“Commercial guest accommodation”** – involving purpose-built commercial accommodation units (including rooms, suites, and beds) in hotels, motels, hostels, dormitories, etc.
- **“Residential guest accommodation”** – involving any temporary accommodation by paying guests in residential dwelling units, of any duration but not including residential tenancies.
- **“Residential tenancy”** – involving a landlord(s) and tenant(s), as defined and governed by the *Residential Tenancy Act*, whether the tenancy is fixed-term or month-to-month.

The benefits of using the term “Residential guest accommodation” term instead of “short-term rental” or “short-term accommodation” include:

- That the term is clearer about the key aspect of the land use (guest accommodation in residential units).
- A cleaner contrast between “Residential Guest Accommodation” use (involving dwelling units) and both “Commercial Guest Accommodation” use (involving accommodation units like hotel suites etc.) and “Residential Tenancy” use for longer-term rentals.
- It enables a move away from arbitrary time thresholds for short-term rentals (e.g. 30 days) so that all dwelling units subject to this kind of land use get captured by Gibsons’ local regulations.

APPENDIX B: Trade-Offs

Short-term rental regulatory programs can be characterized on a basic spectrum defined by generally **restrictive** approaches on one end, and generally **permissive** approaches on the other. In deciding where to land, local governments need to wrestle with several associated trade-offs. The following diagram by Third Space Planning describes some of the key trade offs involved.



The outcomes on the left side of this diagram tend to go together, and the outcomes on the right tend to go together.

If one was to map the nature of a community’s individual regulations on these trade-off spectrums, and they all tended to bundle towards one side of the diagram or the other,

that's an indication of clear goals and priorities, and a more coherent and cohesive program.

If, instead, some land on the right and some land on the left, or all of them aim for the middle, this is a sign of internal tension and potentially insufficient clarity on priorities, which will often produce a less coherent regulatory program overall.

The Town of Gibsons, in prioritizing the protection of long-term rental supply and keeping the scale of businesses appropriate to residential neighbourhoods (the Town's top 2 goals for the program), has landed on the left side of this kind of trade-off diagram. That is, Gibsons will be taking a more restrictive approach to short-term rentals that is in line with many other communities currently prioritizing housing availability and affordability as a top goal.

APPENDIX C: Additional Guidance Regarding Principal Residences

Many of Gibsons' RGA regulations relate to whether or not a particular unit is the operator's so-called "principal residence."

Thus, determining the principal residence status of proposed RGA units will be central to the Town's enforcement efforts. In determining this status, staff are to answer two key questions:

- 1. Does the prospective operator live in the unit for at least nine calendar months in a calendar year?**

At least three categories of evidence will be used to make a determination here:

- a. The operator's self-attestation that this is the case (via their business licence application);
 - b. The use of the address on government ID and documentation related to billing, utilities, insurance, taxes, etc.⁵³
 - c. In cases where an operator is suspected to be in contravention of this provision of the regulations, door-knocks may be conducted throughout the year and/or neighbours interviewed to help verify the degree of the operator's presence or absence on the property.
- 2. Is the prospective operator including more than one dwelling unit in their claimed principal residence?**

The bylaw amendments associated with this policy include provisions that, for the purposes of operating RGA, a person cannot have more than one principal residence, and that a principal residence cannot contain more than one dwelling unit.

⁵³ The idea being that it would be difficult and inconvenient to get/maintain the address listed on these pieces of documentation unless it was in fact the place the operator lived for the majority of the year.

The intent of these provisions is to maximize the use of dwelling units as long-term homes.

In making a determination about whether a particular property contains more than one dwelling unit, this policy directs staff to:

- a. Consider each suite of rooms that could structurally function as a separate dwelling unit without requiring major alterations to be a separate dwelling unit, for the purposes of operating RGA.
- b. When interpreting “structurally function,” as stated in (a), only take into account physical/structural considerations such as the presence of a separate entrance, sleeping, bathroom and cooking facilities,⁵⁴ NOT whether the operator or a member of their household regularly utilizes or claims to utilize a portion of the suite of rooms in question.^{55,56}
- c. Interpret “major alterations,” as stated in (a), to include installing new plumbing lines or electrical circuits e.g. to accommodate a dedicated kitchen or bathroom, or structural renovations such as new walls or entrances.⁵⁷
- d. Use their discretion in identifying and preventing other methods by which operators may seek to circumvent this “single dwelling unit provision” of the regulations, e.g. by documenting the particular circumstances and denying a business licence application on the basis of those circumstances.⁵⁸

Limiting RGA as described in guidance (a) through (d), above, does not mean that long-term rentals will inevitably be created in all units deemed capable of feasibly functioning as a separate dwelling unit, because some operators may choose to

⁵⁴ As set out in the definition of “dwelling unit”.

⁵⁵ For example, an operator could claim one of the rooms in a fully-equipped basement suite as being their home office, and on that basis claim all rooms in the building as constituting a single dwelling unit, for the purpose of these regulations. However, this guidance would rule that use out because the basement suite could feasibly function as a separate dwelling unit without requiring major alterations.

⁵⁶ This is one of the finer aspects of housing-centric STR/RGA regulation that is impossible to get “perfectly right.” It is anticipated that guidance around how to interpret “feasibly function” in Gibsons’ unique context will evolve with experience and time.

⁵⁷ For example, the absence of kitchen appliances is not enough to “erase” the presence of a separate dwelling unit if the electrical or plumbing service lines for these are still present.

⁵⁸

continue using a portion of the space themselves rather than give the entire unit over to a tenant. However, some units *will* be converted to/be retained as long-term rentals, and therefore the trade-off represented by this policy direction is less homeowner flexibility in return for additional encouragement of long-term rental housing at an aggregate level.

Example – Basement suite home office

An owner of a single detached home with a main floor and a fully-equipped basement suite (including separate entrance, kitchen, bathroom, eating and sleeping facilities) regularly uses one room in the basement suite/accessory dwelling unit as their home office, with the rest of the basement suite generally unused. The owner argues that because they regularly use a portion of the basement suite, it could not feasibly function as a separate dwelling unit (i.e. be used as a long-term rental), and so they should be allowed to use the basement suite for entire-unit or partial-unit RGA.

Guidance: This policy’s direction to staff is to only focus on structural considerations such as the presence of a separate entrance, sleeping, bathroom and cooking facilities. If these are present (or could be easily provided without requiring major electrical, plumbing, or structural work) the basement suite would be deemed/confirmed as a separate dwelling unit, and the owner could only claim and use the main floor as their principal residence for the purposes of RGA.

Rationale: If owners were allowed to combine more than one structurally-defined dwelling unit into a single “principal residence” for the purposes of the RGA regulations – e.g. by claiming that their household uses all or part of an accessory dwelling unit to live/conduct their daily affairs – this would open a large loophole in the regulatory framework, whereby some owners could circumvent the intent of the regulations by claiming regular daily usage of an ADU even when that isn’t the case. This loophole would have the effect of:

- Increasing the potential for rental housing loss via RGA – contrary to the #1 goal of the regulations;
- Increasing enforcement complexity – because Gibsons personnel would be required to somehow assess and monitor RGA operators’ claims of ADU usage to uphold the

integrity of the regulatory framework.

Negative impacts: Limiting the interpretation of separate dwelling units to physical/structural considerations means there will be circumstances where an accessory dwelling unit is prohibited for use as RGA even though its current use by the owner precludes offering it as an *entire-unit* long-term rental. These owners will therefore suffer a negative impact in the form of a loss of potential RGA revenue, and the Town a negative impact from the loss of potential tourist accommodation.

Mitigations:

- The owner could still rent *one or more rooms* in the basement suite as a long-term rental, earning the associated revenue and creating a form of long-term housing.
- The owner could still use the main floor as RGA, either vacating the property or staying in the basement suite for the duration of the guest stay.

** Please refer to the accompanying Policy Summary document for additional examples **

APPENDIX D: Number of TUPs

In deciding how many Non-Principal Residence RGA units to temporarily permit while new Commercial Guest Accommodation is sought/constructed, there is no one “best” approach. Rather, the choice should reflect a clear goal for this subcomponent of the policy. Four such goals were considered, including:

- (1) **Maximum supply of RGA in the short-term:** If Council wanted to maximize the supply of RGA over the short-term, including to accommodate continued growth of accommodation units, it could decide to allow as many TUPs for Non-Principal Residence RGA as there were operators willing to pay the associated fees and abide by the associated conditions. The fees and conditions would still lead to a “limited number” of TUPs - likely somewhat fewer than currently available due to the increased cost and operator burden - but the Town itself wouldn't impose a set limit.
- (2) **No loss of RGA:** AirDNA data show that over the 12 months preceding February 14 2022, 6 entire-home properties were booked for 271-365 days, 21 entire-home properties were booked for 181-270 days, and 33 entire-home properties were booked for 91-180 days. Under the policy outlined in this document - where a dwelling unit must be lived in for at least 9 months of the year to count as a Principal Residence - all 60 of these units could, by definition, only be permitted via TUP for Non-Principal Residence RGA. If Council wanted to aim for *no loss* of RGA in the short-term while Commercial Guest Accommodation was being built out, it could justify ~60 of these TUPs.
- (3) **Enough for the summer peak:** During the most recent peak month (Aug, 2021) 79 entire-unit short-term rentals were available on Airbnb and VRBO. Of these, an examination of listing details suggested roughly 2/3rd were non-principal residences (~52 units), and occupancy rates were ~90% (essentially full occupancy). This means that if Council wanted to grant enough TUPs for Non-Principal Residence RGA to accommodate the summer peak, a minimum of ~50 or so TUPs would be required to supplement the ~30 or so units anticipated to come from Principal Residence RGA.⁵⁹

⁵⁹ The Principal Residence RGA would still need to be granted business licences, and abide by the related conditions for that stream of permitting.

- (4) **Enough for the busiest year-round units:** Per the previously-cited AirDNA data, a total of 27 units were booked for more than 180 days over the previous 12 months.⁶⁰ If Council was willing to reduce the Town's stock of guest accommodation somewhat over the short-term, and accept the associated impacts to tourism businesses (e.g. justified by the urgency of the housing crisis), it could concentrate TUPs for Non-Principal Residence RGA in the hands of the busiest (most in-demand/most utilized) operators, offering ~30 or so TUPs, overall.
- (5) **No more than 1.5% of local rental housing stock:** The long-term intention of this comprehensive policy is to eliminate the loss of long-term housing to STR/RGA (i.e. to achieve 0% loss of local housing stock to RGA within 2-5 years). And this goal holds no matter the number of TUPs chosen for over the short-term. However, Council could decide that the housing crisis is so urgent that an immediate contraction of RGA is needed, and its impacts on the tourism sector therefore justifiable (if regrettable). With this rationale, Council could choose to grant a relatively low number of TUPs for Non-Principal Residence RGA, and peg this number to an acceptable degree of short-term housing loss. For example, Squamish recently chose to offer 30, similarly-structured TUPs for Non-Principal Residences, a number that reflected (a) their estimate of the busiest STR units, but also (b) 3-4% of their estimated stock of rental *suites* (~1.5% of their overall rental housing stock). Gibsons could, likewise, choose to only tolerate/sanction a loss of potential housing equal to ~1.5% of the local rental housing stock, offering 10 TUPs overall.

⁶⁰ Reference date of Feb 14 2022

APPENDIX E: Parking

Impacts to street parking are a common concern related to short-term rentals. It is a difficult issue to address because:

- The number of vehicles associated with RGA bookings of any given unit can vary widely.
- There is no known, consistent correlation between the type of RGA (i.e. entire unit or partial unit) and the resulting total parking pressure in Gibsons.⁶¹ Guests of an entire unit rental may bring one vehicle, while guests of a partial unit rental may bring two. Or it may be the reverse, or any of a number of realistic scenarios unique to each unit and booking. In addition, the operator may or may not have one or more parked vehicles of their own at the time of the guest stay.
- There is no known, consistent correlation between the number of bedrooms available in an RGA unit and the resulting total parking pressure in Gibsons. A one bedroom partial unit rental may involve two vehicles (one each for the guest and operator) while an entire unit 4-bedroom rental may only involve one family vehicle.
- In local government bylaws, parking requirements are often stated in terms of the number of *off-street parking spaces dedicated solely for a given use*. However, under the RGA policy described in this document, operators will (a) have drastically different levels of access to off-street parking depending on the nature of the unit (e.g. apartment vs. single-family dwelling) and (b) often use the off-street parking at their disposal in a very fluid way (i.e. sometimes using spaces themselves, at other times assigning them to guests). And as opposed to new builds, where off-street parking can simply be created at the design stage, the vast majority of RGA over the coming years will involve existing units designed before this policy came into effect.
- Recognizing that there is no consistent correlation between RGA unit type or the number of bedrooms and the resulting total parking pressure, some local governments choose to set parking requirements that anticipate something close to the maximum foreseeable demand. However, if parking requirements (again,

⁶¹ If local data was rigorously collected over a number of years, such a correlation at the aggregate level might eventually be described, but this knowledge does not currently exist.

usually stated in terms of dedicated off-street parking) are set too high, a significant number of owners and tenants will be indirectly excluded from operating RGA and the associated household revenue benefits (Council's #3 goal); an exclusion which raises equity concerns.

Gibsons' policy will take a practical, flexible approach to addressing those challenges by asking operators to submit an RGA Parking Plan that is tailored to the individual circumstances of their unit. See [above](#) for more detail.

