

Attn: Ms. Kirsten Rawkins, Planner 1
 Planning and Development Services Department
 Town of Gibsons
 474 South Fletcher Road
 Gibsons, BC V0N 1V0

March 13, 2024

Dear Ms. Rawkins,

Re: Letter of Intent for Development Permit Application (718 North Road)

On behalf of Michco Investments Ltd. (the "Owner"), CityState is pleased to present a form & character Development Permit ("DP") application for 718 North Road. The intent of this application is to meet the guidelines for Development Permit Area ("DPA") #4 in the OCP.

The proposed development includes a generous combination of residential market tenures, including 101 secured market rental and below-market rental units. It also integrates innovative building technologies to deliver low-carbon, mass timber construction in a first-of-its-kind demonstration project. We believe that this proposal meets Gibsons' vision as outlined in *Town of Gibsons Official Community Plan Bylaw No. 985, 2005* (the "OCP") and contributes positively to the region's housing needs.

The purpose of this letter is to provide an overview of our application. Our project team is listed below. Any correspondence related to this application can be directed to the applicant, CityState Consulting Group.

Role	Company / Individual(s)	Contact	Email
Owner	Michco Investments Ltd.		
Applicant	CityState Consulting Group		
Planning	CityState Consulting Group		
Architect	Ankenman Marchand Architects		
Mass Timber Consultant	Massive Canada Building Systems		
Structural Engineer	Timber Engineering		
Landscape Architect	PMG Landscape Architects Ltd.		
Arborist	Beechwood Landscape Services		
Surveyor	Bennett Land Surveying		
Civil Engineer	Aplin & Martin Consultants		
Geotechnical Engineer	GeoPacific Consultants		
Transportation Engineer	Creative Transportation Solutions		

Sincerely,



Aidan Shirley
 Development Manager, CityState Consulting Group

BACKGROUND

The subject property is 56,403 ft² (±1.29 ac) and is adjacent to single-family houses to the north and east, a Telus building to the south, and a BC Hydro sub-station to the west. The property has been used as an RV Park under a Temporary Use Permit (“TUP”) since 2020. CityState was engaged in 2022 to explore options for a multi-family development, consistent with the vision of the OCP. Since then, the owner partnered with Massive Canada Building Systems (“Massive”), a manufacturer of pre-fabricated mass timber building components. The proposed development would likely be the first project constructed using Massive’s innovative building technology.

Massive was the first grant recipient under BC’s Manufacturing Jobs Fund (“MJF”) in June 2023, in part due to written support from the Town of Gibsons (the “Town”) related to the proposed development. Additional, project-specific funding applications to Canada Mortgage and Housing Corporation (“CMHC”), the Green Construction through Wood Program (“GCWood”), and Investment in Forest Innovation and Technology (“IFIT”) are currently under review and would increase the already deep end-user affordability of this project.

CityState and Massive have expressed the urgency of receiving land use approval for the proposed development, which will help to advance the status of the CMHC, GCWood, and IFIT applications. We understand that the previous Development Variance Permit (DVP) application is under review by referral agencies and that DPA #9 requirements have been met at the planning stage. The proposed development will deliver a critical mass of affordable, high-quality housing units that address Gibsons’ core housing needs.

LAND USE

Concurrent updates to the OCP and *Town of Gibsons Zoning Bylaw No. 1065, 2007* (the “Zoning Bylaw”) are underway. New Provincial legislation requires that these processes are completed by the end of 2025. While such updates can often stall development applications, the proposed development clearly meets Gibsons’ housing needs and sustainability goals. As such, we humbly suggest allowing this project to help set expectations for deliverables in medium- and high-density areas in the new OCP.

ZONING

The subject property is zoned Upper Gibsons Commercial District 1 (C-1) per the Zoning Bylaw. The C-1 zone generally allows the provisions needed to permit the proposed development, including the proposed uses—Apartment and Daycare. A review of the Zoning Bylaw determined that C-1 is the most appropriate base zone for a DVP application, as potential Residential Multiple (RM) zones would require a density variance—prohibited under the *Local Government Act* (the “LGA”). As a Zoning Bylaw amendment is not required for the project, it can proceed without an OCP Bylaw amendment in accordance with section 478(2) of the LGA.

Following an initial submission in December 2023, two concerns were raised by Town staff with respect to the intent of the Zoning Bylaw. First, that a Daycare use may not qualify as an eligible ground-floor Commercial use required in the C-1 zone. Eventually, it was confirmed that a Daycare use qualifies as a Service Commercial use and thus meets the bylaw intent. Second, that the 10 three-storey Apartment units in Buildings 2 and 3 have direct access to grade and thus should be classified as Townhouses. To eliminate the perception of “direct access” to grade, a common corridor was added to the front entrance of each building prior to our most recent DVP re-submission.

The Zoning Bylaw does not specify whether “grade” is intended to mean Natural Grade or Finished Grade. In either case, access to the three-storey units is a considerable height from the adjacent sidewalk. The corridor addition is costly, impedes natural light, and detracts from the overall appeal of the buildings. We hope that this bylaw interpretation can be reconsidered in the interest of an improved project.

Our DVP application includes five Zoning Bylaw variance requests, including that:

1. The maximum height is 20.0 m;
2. The minimum Rear Lot Line Setback is 2.00 m; (the applicant will endeavour to increase this setback as much as possible.)
3. Apartment use is permitted on the ground floor;
4. Gross floor area for Apartment dwelling units shall be not less than 48.2 m² (519 ft²) each;
5. The minimum number of required parking spaces for Apartment use is 1.10 per unit.

PROJECT STATISTICS

A full summary of the proposed development's statistics is outlined below.

Specification	C-1 Zone	Proposed	Δ
Lot Area	≥235 m ²	5,240 m ²	+5,005 m ²
Lot Width	≥7.5 m	64.3 m	+56.8 m
Lot Depth	≥30.0 m	81.5 m	+51.5 m
Lot Coverage	≤80%	64%	-16%
Unit Count	-	126	-
1-bedroom	-	85	-
2-bedroom	-	18	-
3-bedroom	-	23	-
Gross Floor Area (GFA)	-	8,349.8 m ²	-
Floor Area Ratio (FAR)	-	1.59	-
Building Storeys	-	6	-
Building Height	≤12.0 m	20.0 m	+8.0 m
Vehicle Parking	≥179	148	-31
Resident	≥161	123	-
Visitor	≥28	28	-
Daycare	≥8		-
Minus: Car Share Reduction	-9	-3	-
Minus: Shared Parking Spaces Reduction	-9	-	-
Bicycle Parking	≥186	217	+31
Residential – Class 1	≥158	-	-
Residential – Class 2	≥26	-	-
Daycare – Class 1	≥1	-	-
Daycare – Class 2	≥1	-	-
Front Lot Line Setback	≥0.00 m	0.00 m	-
Side (Interior) Lot Line Setback	≥1.50 m	16.50 m	+15.00 m
Side (Exterior) Lot Line Setback	≥0.00 m	7.82 m	+7.82 m
Rear Lot Line Setback	≥6.00 m	2.00 m	-4.00 m
North Road Centreline Setback	≥16.50 m	17.79 m	+1.29 m

HOUSING NEEDS

UNIT DIVERSITY

The proposed development includes a mix of 1-, 2-, 3-bedroom units, ranging from 519-1,308 ft². Ten of these units are three storeys, ranging from 1,260-1,308 ft². The largest units in Building 1 are 1,220 ft² and the largest units without an adjoining lock-off suite are 947 ft².

TENURES & AFFORDABILITY

Building 1 includes 116 total units, comprised of 77 market rental units, 24 below-market rental units, and 15 market ownership units. The 101 proposed rental units will be secured for 20 years, per CMHC expectations. The CMHC funding application is intended to facilitate delivery of the 24 below-market rental units. We have received seven letters of support for the project, including from the Sunshine Coast Affordable Housing Society (“SCAHS”), who offered to “assist with the selection of affordable and/or accessible housing tenants.”

The 10 three-storey apartment units in Buildings 2 and 3 are proposed as strata ownership units. The daycare unit on the ground floor will be sold or leased to a local operator; we have secured a letter of interest from Natural Connections Childcare Centre to occupy this space.

The *Sunshine Coast Housing Needs Report* (“SCHNR”) indicates that 78% of Gibsons households are comprised of one or two persons—14% higher than the Provincial average—despite 50% of dwelling units having three or more bedrooms. This marks a need for more appropriate housing options for smaller households to make multi-bedroom units available for families and other large household typologies. Additionally, the SCHNR states that renter households (31%) were nearly eight times more likely than owner households (4%) to be in core housing need. The need for a critical mass of rental and affordable rental units is urgent and will be directly alleviated by the proposed development.

ACCESSIBILITY

Six units in Building 1 are designed to be fully accessible as per *British Columbia Building Code 2018* (“BCBC 2018”) section 3.8.3. These units will be rented at below-market rates; tenants will be screened by the SCAHS or another qualified entity. Five accessible units are three-bedroom apartments with one-bedroom lock-off suites. These provide suitable options for an aging senior to live independently, but in proximity to family, or for someone with a mobility limitation to access a larger unit—the size of which is typically only found in inaccessible detached or semi-attached housing forms. The configuration is also ideal for a caregiver living independently in the lock-off suite, facilitating direct access to a person with a disability occupying the main suite.

DESIGN

PRE-FABRICATED MASS TIMBER STRUCTURE

The proposed development serves as a demonstration project for the pre-fabricated mass timber building technology developed by Massive. This technology reduces embodied carbon emissions and provides a durable, long-lasting building structure. Use of off-site manufacturing will expedite the construction process, limiting noise, traffic, and pollution impacts for the surrounding neighbourhood. The proposed development includes the [first mass timber parkade podium in North America](#) and will serve as a template for future low-carbon, high-efficiency developments.

ARCHITECTURE

Ankenman Marchand Architects is the lead designer and Architect of record for the project. Building 1 will face west, acknowledging the main façade’s visibility from North Road. To reflect its mass timber structure, natural wood finishes are incorporated into the design both on the building façades and at the ground level. A grey-tone colour palette provides a neutral backdrop to enhance these wood finishes and reflects the rugged West Coast topography of Howe Sound that is visible from the site. The building design is intended to integrate with and serve as a reminder of the surrounding landscape that characterizes Gibsons’ eastern gateway.

LANDSCAPING

A Landscape Plan prepared by PMG Landscape Architects Ltd. is enclosed with our application. The landscape design remains conceptual, pending input from Town staff, Council, and Advisory Design Panel (ADP). The Landscape Plan focuses on precedent imagery, selected to create visual interest in the project’s common areas and outdoor daycare space. Interwoven hydropressed slab and wood plank walkway materials provide visual breaks to contiguous common areas, while shrub planters delineate between public and private outdoor spaces. Broad, leafy tree varieties, such as Tiger Eyes staghorn sumac, erupt from the wood-planked areas to create secluded spaces for social features such as benches.

The common rooftop amenity area in Building 1 is designed with various social gathering spaces, accommodating picnic tables, bistro tables, and platform benches in areas that include a community garden, yoga deck, and barbecue. Catenary lighting and varied plantings offer a welcoming space for accessible outdoor gatherings. Pending input from all parties, a detailed Landscape Plan and Cost Estimate will be submitted.

AMENITIES

INDOOR AMENITIES

Building 1 includes two private amenity rooms: a 429 ft² multi-purpose room on the first floor and a 901 ft² multi-purpose room on the sixth floor. Both rooms will be held in common ownership by the strata corporation and made available to tenants for strata meetings, private gatherings, and other events. The proponents have been working with non-profit groups to offer the space for support programs. For example, Sunshine Coast Senior Care expressed interest in using the first-floor room for programs geared to seniors and persons with disabilities, both in the building and from the wider community. The Sunshine Coast Association for Community Living also asked for opportunities to use amenity space to extend services to tenants. No binding agreements are in place at this time.

OUTDOOR AMENITIES

The common courtyard that separates Building 1 from Buildings 2 and 3 has been programmed to create miniature gathering nodes (see LANDSCAPING section). The three-storey units will have access to the courtyard, the common lobby in Building 1, and all other amenities.

ROOFTOP AMENITIES

The larger multi-purpose room will provide access to a rooftop amenity space above the fifth floor of Building 1. It will overlook North Road and Hillcrest Road, and offer scenic views of Howe Sound and the local mountains. See LANDSCAPING section for programmatic details.

ACCESS & TRANSPORTATION

VEHICLE ACCESS

The site is accessed from Hillcrest Road via North Road, Creekside Crescent, or Crucil Road. Two curb letdowns are proposed from Hillcrest Road to the property. One serves a small pick-up/drop-off parking lot (seven spaces) to the west of the daycare entrance, while the other serves a larger 46-space parking lot at the east side of the site as well as a ramp down to the 98-space parkade.

A Traffic Impact Assessment (TIA) is being undertaken by Creative Transportation Solutions (CTS) and will be provided prior to approval of the DVP. Peak hourly trip generation rates for the proposed development are 87 during the morning period (47 Residential; 40 Daycare) and 89 during the afternoon period (49 Residential; 40 Daycare). The TIA will include analysis of the intersections of North Road at Reed Road and Gibsons Way and will aim to analyse peak traffic flows when ferry traffic coincides with school pick-up and drop-off.

Proximity to Upper Gibsons services, bus stops on North Road, and shared vehicles will reduce the number of personal vehicle trips and promote alternative transportation options. These features are quantified below.

PARKING

Section 6.12 of the Zoning Bylaw requires 1.5 parking spaces per Apartment dwelling unit, including 15% (28) required to be reserved for visitors. The proposed development includes 123 resident parking spaces. The remaining 28 parking spaces will be shared between the daycare (eight required) and visitors (28 required), which are typically used during offsetting periods. Section 6.05(4)(a) of the Zoning Bylaw allows a 25% reduction of required parking spaces for shared uses. These provisions are appropriate for areas close to public transit and reflect a societal shift away from private car ownership. Offering fewer parking spaces enables deeper affordability to end users and recognizes the availability of alternative transportation options.

Section 6.05(2)(d)(iii) of the Zoning Bylaw stipulates that a parking space provided for a car share vehicle shall “not be counted towards the minimum number of required visitor parking spaces.” Therefore, while the total number of parking spaces in the proposed development is 151, the number of eligible spaces is only 148, representing a variance of 31 spaces (17%) compared to the 179 spaces required per the Zoning Bylaw. The proposed provisions of small car parking spaces (42) and parking spaces for persons with disabilities (nine) comply with Zoning Bylaw requirements. The requirement for one loading bay is also met in the parkade level of Building 1.

CAR SHARE

Section 6.05(2)(b) of the Zoning Bylaw allows a reduction of three required parking spaces for each shared vehicle and shared vehicle parking space provided. Three such vehicles and parking spaces are proposed for the development and will be included as part of the shared daycare and visitor parking provisions. These vehicles will likely be owned and operated by the Coast Car Co-op, subject to a formal legal agreement.

PUBLIC TRANSPORTATION

The subject site is located ±80 m and ±250 m, respectively, from northbound and southbound bus stops along North Road. These stops are served by the number 90 bus route, running from Langdale Ferry Terminal to Downtown Sechelt. Buses run in intervals ranging from 30 minutes to 90 minutes. Providing compact, efficient housing within walking distance of public transit encourages uptake for alternative modes of transportation.

ACTIVE TRANSPORTATION

A variety of amenities are accessible within walking distance, including Gibsons Elementary School, Elphinstone Secondary School, and numerous parks, churches, restaurants, shops, and recreational facilities. The proposed development is also a 3-minute bicycle ride or 14-minute walk from Lower Gibsons. Provision of 217 bicycle parking spaces encourages active transportation whenever possible and exceeds the requirements established in section 6.18 of the Zoning Bylaw by 17%.

TRANSPORTATION MASTER PLAN

A controlled pedestrian crossing at North Road and Kiwanis Way is desired by the Town. This reflects feedback from the Town's Active Transportation Network Plan project. A controlled crossing would enhance pedestrian safety along North Road and provide safer access to the businesses on the west side of North Road. As advocates for more walkable communities, we endorse this desired upgrade.

SERVICING

UTILITIES

A conceptual Civil Key Plan has been prepared by Aplin & Martin Consultants. Additional Civil drawings, including Site Servicing Plan, Lot Grading Plan, and Stormwater Management Plan, will be provided with the full DP application. Final, detailed servicing drawings will be completed pending feedback from the Town's Infrastructure Services department.

ELECTRICAL

One pad-mounted transformer ("PMT") is proposed near the eastern site entrance adjacent to Hillcrest Road. The location of the PMT is approximately above the electrical room in the parkade level, allowing for easy electrical design and maintenance. Detailed design and final location of the PMT will be confirmed following consultation with BC Hydro at the full DP stage.

WASTE DISPOSAL

CityState engaged AJM Disposal Services Ltd. to provide feedback with respect to waste collection and staging. The proposed storage and collection comply with *Garbage and Organics Collection and Disposal Bylaw No. 1252, 2018*. Waste disposal is proposed within an enclosed room in the parkade level with direct ramp access to Hillcrest Road. Garbage, recycling, and green waste/compostable bins will be provided for the development, and it will be the responsibility of the strata corporation to ensure timely placement of the bins in the staging area for collection. The staging area is proposed along Hillcrest Road to avoid disruptive maneuvering within the site.

POSTAL SERVICE

Mailboxes will be installed in the residential lobby of Building 1, pending input from Canada Post.

ENVIRONMENT

MATURE TREES

Beechwood Landscape Services completed a site visit in August 2023 to assess protected trees as defined by *Tree Preservation Bylaw No. 1282, 2020* (the “Tree Preservation Bylaw”). A total of 43 protected trees were identified either on-site or as having a Critical Root Zone (“CRZ”) that extends within the site boundaries. These trees are inventoried and described in an Arborist Report dated December 2023. Due to the significant area of excavation and paving required, all trees must be removed prior to development. Seven such trees are located on the neighbouring property at 768 Hillcrest Road and will require the owner’s permission prior to removal. Five additional trees are located on Town lands (within the Hillcrest Road and North Road rights-of-way) and will require the Town’s permission prior to removal. Section 5.2 of the Tree Preservation Bylaw requires that Replacement Trees of the same species are planted at a 2:1 ratio. Native tree replanting will occur within the site boundaries (see Landscape Plan), however Replacement Trees will not be of the same species as the trees proposed for removal. The predominance of large species such as Western Red Cedar (16), Douglas Fir (10), and Zebrina Cedar (5) means that Replacement Trees will be of different species permitted in Schedule E of the Tree Preservation Bylaw or comparable native species, as supported by the Town. It is anticipated that a cash-in-lieu contribution will be required for several required Replacement Trees that cannot be accommodated on-site.

ENERGY EFFICIENCY

Section 15.4 of *Town of Gibsons Building Bylaw No. 1284, 2020* (the “Building Bylaw”) requires that new Part 3 construction “meet[s] the minimum performance requirements specified in Step 1 of the Energy Step Code.” On May 1, 2023, the Provincial government updated BCBC 2018 to require that the minimum energy efficiency for new Part 3 buildings shall be 20% better than previous requirements—equivalent to Step 2 of the *BC Energy Step Code* (the “Step Code”). The proposed development exceeds these requirements and is expected to provide an energy efficiency equivalent to or greater than Step 3 of the Step Code.

GEOTECHNICAL & HYDROGEOLOGY

GEOTECHNICAL INVESTIGATION REPORT

A Geotechnical Investigation Report was undertaken by GeoPacific Consultants, following a site visit on February 9, 2024. The investigative works were completed in accordance with DP-2024-09, issued on January 26, 2024, and the resulting Geotechnical Investigation Report was submitted to Town staff on March 6, 2024. We understand that no further investigations or submissions are required to satisfy DPA #9 guidelines at this stage of the project. The investigation included four auger boreholes drilled to depths of 6.1 m below grade; static groundwater was not encountered. The report concludes that “no special site preparation measures are anticipated.”

HYDROGEOLOGICAL INVESTIGATION REPORT

The subject site is within DPA #9 (Gibsons Aquifer), requiring assessment of the contamination potential of the proposed development as well as identification of existing wells within 300 m of the site and possible impacts thereof. Correspondence with Town staff confirmed that the potential for environmental contamination resulting from the proposed Daycare use is not sufficient to warrant a professional study of this risk. An assessment of the Wellhead Protection Area in accordance with general DPA #9 guidelines will be undertaken by GeoPacific Consultants and provided at the Building Permit (“BP”) stage of the project.

ARCHAEOLOGY

A data request was submitted to the BC Archaeology Branch in December 2023, confirming that the site is clear of known findings. The Branch “[did] not identify a need for archaeological study or Provincial heritage permit(s).” CityState, the Owner, and our contractors will work with Town staff, Skwxwú7mesh Úxwumixw (the “Squamish Nation”), and their consultants to ensure that proper precautions are taken with respect to any potential archaeological findings during land clearing and construction.

PUBLIC CONSULTATION

CityState and the owners are committed to early and ongoing public engagement. We employ a mix of methodologies to engage neighbours and solicit feedback from the community about our projects. We engaged in discussions with several community groups over the past two years. We also provided frequent progress reports to the Sunshine Coast Housing Action Table. We sought advice from and worked closely with the Sunshine Coast Affordable Housing Society, Habitat for Humanity, and a local daycare provider.

The project has received letters of support from the following community groups/entities:

- Gibsons & District Chamber of Commerce
- Kiwanis Club of Sunshine Coast
- Natural Connections Childcare Centre
- Patrick Weiler, Member of Parliament for West Vancouver-Sunshine Coast-Sea to Sky Country
- Sunshine Coast Affordable Housing Society
- Sunshine Coast Association for Community Living
- Sunshine Coast Senior Care

We have also received written recognition of this project's benefits from Sunshine Coast Resource Centre and Vancouver Coastal Health.

MEDIA ENGAGEMENT

The proposed development began attracting media attention in June 2023 when DailyHive published [an article](#) on the project's mass timber parkade. CityState and Massive plan to continue engaging the community, as well as the wider building and development industries, through strategic media engagements. The proposed development will lead the way for new, more sustainable building practices across the world. Media coverage will shine a positive, progressive light on Gibsons' endorsement of innovative solutions to housing affordability. It will also serve to inform residents of updates to the project and create a sense of pride for Gibsons' leadership in this space.

CONCLUSION

The enclosed DP application outlines the form and character of the proposed 126-unit development. Careful consideration has been taken to deliver a project that responds meaningfully to Gibsons' need for more affordable housing. The proposed development includes several highlights, including 77 market rental and 24 below-market rental units; innovative, low-carbon building technology; and energy efficiency that exceeds Building Bylaw and BCBC 2018 requirements.

This application is made at a time when the owner's GCWood and IFIT grant applications have already progressed to the second review stage. We look forward to presenting the enclosed application to Advisory Design Panel at the earliest opportunity, and hope that staff will support this benefit-rich proposal. We appreciate your review of our application and are available to respond to comments or questions at any time. Correspondence related to this application can be directed to Aidan Shirley, Development Manager, at aidan@citystate.ca.