Ms. Lesley-Anne Staats, Director
Planning & Development Services Department
Town of Gibsons
474 South Fletcher Road
Gibsons, B.C. V0N 1V0

October 23, 2026

Dear Ms. Staats:

Re: Letter of Intent for OCP Amendment & Zoning Amendment Applications (1118 & 1150 Sunshine Coast Highway)

On behalf of [redacted] (hereafter "**Owner**") and the beneficial owner, [redacted] ("**Developer**"), CityState is pleased to present OCP Amendment and Zoning Amendment applications for the lands civically described as 1118 and 1150 Sunshine Coast Highway ("**Lot A**" and "**Lot 3**", respectively, and collectively the "**Site**"). The intent of the applications is to enable master-planned, multi-phase development consisting of Residential, Commercial, and Service Commercial Uses.

The Proposed Development (defined later herein) includes a variety of housing forms and unit sizes which are collectively intended to meet the needs of diverse household typologies. It also includes considerable Commercial and Service Commercial space which, along with Gibsons Park Plaza and proposed Residential Uses, would create a walkable, mixed-use community at Gibsons' western gateway.

The purpose of this letter is to provide an overview of our applications for staff and Council's consideration. Our project team is listed below. Any correspondence related to this application may be directed to the applicant, CityState Consulting Group.

Role	Company / Individual(s)	Contact	Email
Developer	Seacliff Properties (Gibsons) Ltd.	[redacted]	[redacted]
Applicant	CityState Consulting Group	[redacted]	[redacted]
Development Manager	CityState Consulting Group	[redacted]	[redacted]
Architect	Celso Stifelmann Architect Inc.	[redacted]	[redacted]
Landscape Architect	Joe H. Zhou Landscape Architects Inc.	[redacted]	[redacted]
Arborist	Beechwood Landscape Services	[redacted]	[redacted]
Biologist	Cascadia Biological Services	[redacted]	[redacted]
Environmental Consultant	Keystone Environmental Ltd.	[redacted]	[redacted]
Geotechnical Engineer	GeoPacific Consultants Ltd.	[redacted]	[redacted]
Surveyor	Bennett Land Surveying Ltd.	[redacted]	[redacted]
Civil Engineer	Aplin & Martin Consultants Ltd.	[redacted]	[redacted]
Power Consultant	Site Power Engineering Consultants Ltd.	[redacted]	[redacted]
Transportation Engineer	Creative Transportation Solutions Ltd.	[redacted]	[redacted]

Sincerely,

Aidan Shirley
Development Manager, CityState Consulting Group

EXECUTIVE SUMMARY

The Site is proposed to be developed with four Commercial buildings, one Service Commercial building, four Apartment buildings, and 11 Townhouse buildings which would accommodate approximately 436 Residential Dwelling Units and 6,982.6 m^2 of non-Residential floor space ("**Proposed Development**"). The proposed density and uses require amendments to Town of Gibsons ("**Town**") bylaws, necessitating the enclosed OCP and Zoning Amendment applications.

The Proposed Development is designed to serve as an entrance to Gibsons at its western boundary. It provides an extension of Gibsons Park Plaza along the Site's highway frontage and delivers over 400 Dwelling Units in mixed building forms that taper down in height towards the northwest corner. It is transected by one natural stream which would be protected in accordance with provincial legislation, ensuring its continued health and ecological function.

The enclosed applications have been prepared with consideration of the herein referenced Town bylaws, plans, and policies. As such, we expect that these applications meet the Town's expectations for consideration of OCP and Zoning Amendments. We look forward to presenting these applications to Council and the community.

SITE DESCRIPTION

The Site is located at the western extent of Upper Gibsons, a neighbourhood which has potential to accommodate most of the Town's growth over the coming decades. It consists of two parcels comprising 60,680 m^2 (±6.07 ha), the majority of which is unimproved. Lot A (±20,260 m^2) has been used for various purposes in recent years, including as a bus depot, Town works yard, and as storage for local television production. Prior to January 20, 2026, Lot A was zoned I-1 pursuant to *Sunshine Coast Regional District Zoning Bylaw No. 310, 1987* ("**SCRD Bylaw No. 310**"), which allowed "storage" as a permitted principal use. The parcel has been continuously used for storage of vehicles and trailers for television production, as well as associated off-street parking, since SCRD Bylaw No. 310 was in effect. Pursuant to section 528 of *Local Government Act*, R.S.B.C. 2015, c. 1 ("**LGA**"), this use may be continued as a non-conforming use. Lot 3 (±40,420 m^2) has been unimproved since the late-2000s, when a small, detached Residential structure was removed by a previous owner.

The Site is surrounded by low-density Residential Uses (north; west), Gibsons Park Plaza (east), and Sunshine Coast Highway (south). South of Sunshine Coast Highway are Industrial Commercial Zone (CI-1)-zoned lands currently improved for Warehousing and other zoning-compliant uses. The Site's western lot line overlies the Town's boundary with Sunshine Coast Regional District ("**SCRD**") Electoral Area 'E' (Elphinstone). The Site, along with other properties surrounding the Gibsons Way/Payne Road intersection, were within SCRD jurisdiction until December 2009, when a boundary adjustment incorporated them into the Town.

The Site is accessible from Sunshine Coast Highway or informally via private drive aisles at Gibsons Park Plaza. As this is the Site's only highway frontage, it will remain the primary access for any future development.

LAND USE

AGRICULTURAL LAND RESERVE

The Site is not within the Agricultural Land Reserve ("**ALR**"), however it abuts such lands to the north and west. Proposed setbacks therefrom would be 10 m, consistent with section 3.2.1 of *Zoning Bylaw No. 1342, 2025* ("**Zoning Bylaw**"). Design of the setback areas would be guided by prevailing Ministry of Agriculture standards, generally aiming to buffer ALR lands from urbanized areas by implementing landscape buffers and anti-trespass measures.

OFFICIAL COMMUNITY PLAN

Map A-1 of *Official Community Plan Bylaw No. 1339, 2025* ("**OCP**") designates the Site as Special Study Area B (SSB), acknowledging its potential to "allow a mix of uses with any combination of residential, commercial, parks and recreation, and industrial land uses." While this

designation does not provide detailed policy direction as to how this is to be achieved, it is our understanding that staff and Council expect an applicant-driven approach with consideration of the policies that apply broadly to the foregoing uses.

The enclosed OCP Amendment application proposes to re-designate the Site to a combination of Mixed-Use Commercial (MC) and High-Density Residential (HR) to enable the proposed Zoning Amendment. In addition to this map amendment, Map C-4 would also be amended to reflect the Development Permit Areas ("**DPAs**") which correspond to the new land use designations. General and use-specific policies would apply within each designation.

DEVELOPMENT PERMIT AREAS

Maps C-1, C-2, C-3, and C-4 of the OCP designate the Site as being within four DPAs: Geohazard (GH DPA); Environmentally Sensitive Areas (ESA DPA); Aquifer Protection (AP DPA); and Upper Gibsons Commercial Development Permit Area (UGC). The proposed OCP Amendment would re-designate a portion of the Site from UGC to Multi-Unit Residential Development Permit Area (MUR) where Residential Uses are proposed.

While form and character DPAs (UGC and MUR) will be addressed in detail at the Development Permit stage, the enclosed applications consider the impact of the GH, ESA, and AP DPAs. Such consideration is further discussed in the *RIPARIAN AREAS* and *GEOTECHNICAL* sections herein.

ZONING

Section 1.2 of the Zoning Bylaw designates the Site as Future Commercial Zone (CF), allowing very limited Business Services and Service Commercial Uses. Prior to adoption of the Zoning Bylaw in January 2026, staff and Council expressed that the purpose of this designation is not to guide future development, but rather to serve as an interim designation until such time as a master-planned development is proposed. This effectively necessitates and encourages a Zoning Amendment application for the Site, especially for any proposed development which is consistent with the vision of the OCP.

The enclosed Zoning Amendment application proposes to re-designate the Site to a combination of Mixed-Use Commercial Upper Gibsons Zone (CM-2) and High-Density Residential Zone (RH-1). Both designations contemplate Commercial and Residential Uses—up to a maximum of 150 Dwelling Units per hectare ("**UPH**") unless otherwise provided for in a Housing Agreement Bylaw ("**HA Bylaw**").

The Site would likely be subdivided to create separate parcels for Commercial and Residential Uses ("**Commercial Parcel**" and "**Residential Parcel**", respectively). The Proposed Development includes 436 total Dwelling Units, equating to ±71.9 UPH on the entire Site, or ±156.1 UPH on the ±27,938 m^2 (±2.79 ha) Residential Parcel alone. We propose that an HA Bylaw would apply the provision of 150 UPH to the Site as a whole, regardless of any parcel boundaries thereupon. This would also enable the Residential Parcel to potentially be subdivided further to facilitate separate strata plans for each building.

As the Proposed Development is consistent with the density and use regulations of the proposed zoning designations, no Site-specific text amendments are expected to be necessary. Any relaxations that emerge through the Town's review process may be addressed via a Development Variance Permit application concurrent with future phase-specific Development Permit applications.

A draft map schedule is appended hereto as Schedule 'A', identifying those portions of the Site proposed to be zoned CM-2 and RH-1, respectively. CM-2-zoned lands would correspondingly be designated MC and UGC in the OCP (and, for certainty, comprise the Commercial Parcel), while RH-1-zoned lands would be designated HR and MUR (and comprise the Residential Parcel).

VARIANCES

If any phase of the Proposed Development requires Site-specific variances to the Zoning Bylaw or other Town bylaws, a Development Variance Permit application will be submitted concurrently with the phase-specific Development Permit applications.

DEVELOPMENT STATISTICS

The Proposed Development's statistics are summarized in Table 1, below. Red font indicates a potential Site-specific variance.

Table 1. Development Statistics

Specification	CM-2 Regulation	RH-1 Regulation	Proposed	Δ
Lot Area	≥235 m²	≥1,000 m²	60,680.331 m²	+59,680.331 m²
Lot Width	≥30.0 m	≥25.0 m	204.160 m	+174.160 m
Lot Depth	≥7.5 m	≥25.0 m	296.965 m	+271.965 m
Lot Coverage[1]	≤80%	≤80%	TBD	TBD
Gross Floor Area (GFA)	-	-	42,198.22 m²	-
Apartment	-	-	*25,260.07 m²*	-
Townhouse	-	-	*9,955.59 m²*	-
Retail/Office	-	-	*3,534.43 m²*	-
Service Commercial	-	-	*3,448.13 m²*	-
Floor Area Ratio (FAR)	-	-	0.70	-
Building Height[2]	≤20 m	≤20 m	20.00 m	-
Dwelling Units (per Hectare)[3]	≤150	≤150	71.85	-78.15
Dwelling Units (Total)	≤910	≤910	436	-474
Apartment	-	-	*380*	-
Townhouse	-	-	*56*	-
Amenity Area[4]	≥4,360 m²	≥4,360 m²	TBD	TBD
Setback: Front Lot Line	≥3.00 m	≥3.00 m	10.00 m (min.)	+7.00 m
Setback: Interior Side Lot Line (Res.)	≥0.00 m	≥1.50 m	10.00 m (min.)	+8.50 m
Setback: Interior Side Lot Line (Com.)	≥1.50 m	≥1.50 m	5.56 m (min.)	+4.06 m
Setback: Rear Lot Line	≥1.50 m	≥1.50 m	10.00 m (min.)	+8.50 m
Setback: Highway 101	≥5.00 m		10.00 m (min.)	+5.00 m
Setback: ALR	≥10.00 m		10.00 m (min.)	-
Setback: Watercourse	≥5.00 m		11.50 m (min.)	+6.50 m
Vehicle Parking	≥654 spaces		778 spaces	+124 spaces
Resident	*≥436 spaces*		*509 spaces*	*+73 spaces*
Visitor	*≥47 spaces*		*47 spaces*	-
Retail/Office	*≥84 spaces*		*134 spaces*	*+50 spaces*
Service Commercial	*≥87 spaces*		*88 spaces*	*+1 spaces*
Bicycle Parking	≥593 spaces		632 spaces	+39 spaces
Residential Class 1	*≥522 spaces*		*549 spaces*	*+27 spaces*
Residential Class 2	*≥24 spaces*		*36 spaces*	*+12 spaces*
Commercial Class 1	*≥17 spaces*		*17 spaces*	-
Commercial Class 2	*≥30 spaces*		*30 spaces*	-

[1] Lot Coverage to be calculated at Development Permit stage, as use of permeable/impermeable paving systems not yet determined.

[2] Building Height may be increased from 15 m to 20 m subject to a Housing Agreement with the Town of Gibsons.

[3] Dwelling Units per Hectare may be increased beyond 150, subject to a Housing Agreement with the Town of Gibsons.

[4] Amenity Areas to be identified at Development Permit stage for each project phase.

HOUSING NEEDS

Town of Gibsons Housing Needs Report ("**HNR**") identifies a need for 1,057 new Dwelling Units by 2041, equating to an average of nearly 53

new Dwelling Units per year. Recent provincial enactments and challenging market conditions have slowed development activity regionally and made it harder to deliver housing that is attainable for median income-earning households.

Of the 1,057 new Dwelling Units needed in Gibsons, approximately two-thirds should be available for ownership, including three-quarters of those needed to address household growth. This suggests that new households to Gibsons are most often looking to purchase a primary residence. A low regional vacancy rate also indicates undersupply of Dwelling Units available to renter households. The Proposed Development aims to alleviate both of these supply shortages by providing a combination of housing tenures which address these needs, including market rental and ownership options. The exact quantity of each tenure will be based on market conditions and secured by HA Bylaw.

Finally, the breakdown of proposed unit sizes includes: 218 studio/one-bedroom (50.0%); 156 two-bedroom (35.8%); and 62 (14.2%) three-bedroom. A summary of how this compares to projected housing needs is outlined in Table 2, below.

Table 2. Unit Breakdown Compared to Housing Needs

# of Bedrooms	Proposed	Housing Need	Δ
Studio	48 units (11.0%)	40%	+10.0%
1 bedroom	170 units (39.0%)		
2 bedrooms	156 units (35.8%)	35%	+0.8%
3+ bedrooms	62 units (14.2%)	25%	-10.8%

The proposed unit sizes closely align with the Town's housing needs. A slightly higher ratio of studios and one- and two-bedroom units reflects the viability of and desire for smaller units in Apartment buildings and larger units in ground-oriented buildings, including Townhouses and multiplexes. Together with future development of larger units in low- and medium-density Residential zones elsewhere in Gibsons, the ratio of proposed unit sizes supports an aggregate balance across the Town that reflects the needs set out in the HNR.

DESIGN

SITE LAYOUT

The layout of the Proposed Development is guided by the following principles:

- Create a mixed-use "gateway" development that encourages walkability and multi-modal transportation;
- Provide Commercial Uses that complement the existing Gibsons Park Plaza;
- Locate Residential Uses above or behind (in this case behind) Commercial Uses fronting the highway;
- Scale Residential Uses down towards ALR boundary at north and west Lot Lines;
- Avoid below-grade structures on Lot A to minimize disturbance of contaminated soils;
- Protect and enhance riparian areas as public amenity and buffer between different uses;
- Create efficient circulation that enables clear navigation and minimizes conflict between Commercial and Residential Uses; and
- Enable phased delivery to respond agilely to market demand and housing needs.

Collectively, these inform a site layout that prioritizes a Commercial extension of Gibsons Park Plaza on Lot A, with more pedestrian-oriented (e.g. Retail, Office) uses closer to the highway frontage. Residential Uses are located behind Commercial Uses on Lot 3 and focus higher densities away from adjacent ALR lands. Townhouse buildings adjacent to ALR lands will be no taller than zoning regulations stipulate for those parcels—namely 10.5 m to the north and 11.0 m to the west.

Lots A and 3 will continue to be separated by the Chaster Creek Tributary (defined later herein), unaltered from its current condition. Riparian areas will be further enhanced to create a total vegetated restoration area exceeding 20 m in width (inclusive of channel). This serves as a buffer between Service Commercial Uses on the Commercial Parcel and Apartment Buildings A-C on the Residential Parcel. One bridge crossing is proposed west of Retail Building D to provide on-Site connectivity between all proposed Commercial Uses.

ARCHITECTURAL DESIGN

Celso Stifelmann of Celso Stifelmann Architect Inc. ("**CSA**") is the Architect of record for the project. CSA has extensive experience designing mixed-use master plans and Commercial shopping plazas across Canada. The enclosed Master Development Plan has been prepared by CSA in collaboration with the Developer and project team. Detailed Architectural Plans and Drawings, including Floor Plans, Sections, Elevations, Materials Boards, and Renderings will be completed at Development Permit stage. Illustrations at this stage reflect the conceptual and use-focused nature of OCP-level design. Development statistics are preliminary until further design development is completed.

FLOOR PLANS & ACCESSIBILITY

Pursuant to *Ministerial Order No. BA 2025 01*, sentence 3.8.5.1.(3) of *British Columbia Building Code 2024* ("**BCBC 2024**") requires that 20% of the proposed Apartment Dwelling Units must be designed to be adaptable. This equates to ±19 Dwelling Units in each of Apartment Buildings A-D. At this preliminary stage of design, all proposed Dwelling Units are sufficiently dimensioned to accommodate adaptable design thereof. Final floor plans will be developed at the Development Permit stage and will include identification of adaptable Dwelling Units.

The proposed Dwelling Unit sizes aim to satisfy buyer and tenant expectations for more spacious living on the Sunshine Coast. Typical unit sizes are summarized in Table 3, below.

Table 3. Summary of Typical Unit Sizes

Building Type	Unit Type	Quantity	Avg. Unit Size
Townhouse	3+ bedrooms – Type A	24 units (5.5%)	183.0 m² (1,970 ft²)
	3+ bedrooms – Type B	32 units (7.3%)	173.8 m² (1,871 ft²)
Apartment	Studio	48 units (11.0%)	44.7 m² (481 ft²)
	1 bedroom	170 units (39.0%)	58.2 m² (626 ft²)
	2 bedrooms	156 units (35.8%)	73.8 m² (794 ft²)
	3 bedrooms	6 units (1.4%)	89.4 m² (962 ft²)

LANDSCAPE DESIGN

A conceptual Landscape Plan and perspective illustrations prepared by Joe H. Zhou Landscape Architects Inc. provide a visual indication of how various areas of the Site will be landscaped. Given the preliminary scope of design for the enclosed applications, typical planting schemes—consisting of trees, shrubs, and ground-level plantings—are conceptualized for six distinct zones in an enclosed memo.

Wherever possible, native and drought-tolerant plant species are prioritized. Multi-layered planting configurations increase plant density, especially in buffer areas—adjacent to buildings, between uses, and along Lot Lines.

AMENITIES

Section 2.3.2.4.2 of the Zoning Bylaw requires 10 m² (107.64 ft²) of Amenity Area per Dwelling Unit in the RH-1 zone. Amenity Area is defined as "indoor and outdoor spaces that provide recreational, social, or leisure facilities." The Proposed Development includes sufficient outdoor space (including on roof levels of Apartment buildings) to meet this threshold. Indoor amenity spaces may also be provided. Given that the scale of the Proposed Development requires ±4,360 m² (46,931 ft²) of Amenity Area, CityState and the Developer are doubtful that this will be feasible or marketable. Factoring for economies of scale, there may be opportunities to provide lesser total Amenity Areas that are shared between buildings. It is premature at this early stage of the project to identify specific Amenity Areas or programming thereof. These will be identified and designed at the Development Permit stage for each phase of development.

ACCESS & TRANSPORTATION

ROAD ACCESS & CIRCULATION

There are presently two driveway accesses into the Site from Sunshine Coast Highway, at ±41 m and ±108 m from the southeast corner of the Site, respectively. CityState and the Developer met with Ministry of Transportation and Transit ("**MOTT**") staff in December 2023 to discuss access from and possible improvements to the highway. MOTT declined to provide guidance at such an early stage of design and noted that they would respond to a formal referral from the Town following submission of a development application.

The Proposed Development would be accessed at approximately the same locations as the existing driveways. All on-Site roads would be privately owned and for the exclusive use of residents, businesses, and their visitors. Section 9 of *Land Title Act Regulation*, B.C. Reg. 334/79 allows new parcels created by subdivision to be accessed solely via easement. An easement for the benefit of access will be granted over the portion of roadway from the Site's front Lot Line to the Residential Parcel, providing legal access thereto for residents and visitors. Additional easements may be registered over portions of the Commercial Parcel and the Gibsons Park Plaza parcel to the east to facilitate passage across these lands by commercial vehicles. This is not an urgent matter, as the Developer plans to retain ownership of these lands post-completion and can register easements at their discretion and upon necessity.

It is anticipated that third parties, including public utilities, may require blanket statutory rights of way ("**SRWs**") to be granted under section 218 of *Land Title Act*, R.S.B.C. 1996, c. 250 ("**Land Title Act**"). Such agreements will be negotiated and drafted prior to subdivision approval for the Proposed Development.

The Site has been designed to allow safe and efficient maneuvering by all anticipated vehicle users, including fire trucks, waste collection trucks, and heavy single-unit trucks. CityState engaged Gibsons Fire Department and AjM Disposal Services Ltd. to confirm truck dimensions and inform design. Swept Path Analyses have been completed by Creative Transportation Solutions Ltd. ("**CTS**") and show no conflicts for the foregoing vehicles on the on-Site roads.

A Trip Generation Memo prepared by CTS in September 2026 identifies an anticipated 549 vehicle trips to and from the Site during the Saturday mid-day peak hour, split relatively evenly between inbound (51.5%) and outbound (48.5%) trips. A majority (287; 52.3%) of these trips will ingress and egress the Site at the proposed western entrance. Furthermore, over 70% of the modelled trip generation is attributable to the Commercial Uses, with just 164 (±0.38 per Dwelling Unit) trips attributable to Residential Uses.

A full Traffic Impact Assessment will be completed upon acceptance of the enclosed study Terms of Reference by the Town and MOTT.

PARKING

Parking provisions in the Proposed Development exceed the requirements set out in section 4.1.5 of the Zoning Bylaw. A total of 222 Parking Spaces are proposed on the Commercial Parcel, equating to one space per 31 m^2 of Gross Floor Area ("**GFA**"). It is generally assumed that most non-Residential GFA will be occupied by Retail, Office, or Service Commercial Uses, requiring one Parking Space per 40-55 m^2. If significant GFA is to be occupied by more parking-intensive uses (namely, Arts and Culture, Entertainment and Recreation, or Food and Beverage), the sufficiency of the parking provisions would be determined on a case-by-case basis through the business licencing process.

Residential parking provisions significantly exceed the Town's requirements, reflecting anticipated marketability for new housing at this location. All Townhouse Dwelling Units are provided with two Parking Spaces, however 32 units would only include one enclosed Parking Space, with room for a second vehicle outside on the driveway. This provides affordability for homeowners and provides greater living space on the main floor, improving livability and accessibility. In the four Apartment buildings, it is anticipated that one Parking Space would be assigned to each Dwelling Unit and that excess Parking Spaces would be made available for residents to rent. This ensures that Parking Spaces are allocated efficiently with respect to demand, despite occupant turnover from time to time. It also serves to avoid overcharging households that live a car-lite lifestyle.

All required visitor Parking Spaces for Residential Uses are provided at surface level. Should this change at Development Permit stage, shared use of additional Parking Spaces on the Commercial Parcel will be secured for visitors of the Residential Parcel, as permitted by section 4.1.4.4 of the Zoning Bylaw.

Loading Spaces, Class 1 and 2 Bicycle Parking Spaces, Mobility Scooter Parking Spaces, and Cycling End-of-Trip Facilities will be provided in accordance with section 4.1 of the Zoning Bylaw and will be identified and designed at the Development Permit stage.

PUBLIC TRANSPORTATION

There is a westbound bus stop (#170143) located in front of 1100 Sunshine Coast Highway, ±22 m east of the Site's southeast corner. For most of the year, it is served 31 times daily on weekdays and 13 times daily on weekends by the #90 bus route (Sechelt-Gibsons/Langdale Ferry Express), with peak and average frequencies of 15 minutes and ±33 minutes, respectively. Service frequency occasionally increases in the summer months. The corresponding eastbound bus stop (#170068) is located ±171 m east of the Site. Bus stop #170143 is also served four to seven times per week by the westbound Sunshine Coast Connector, which runs from Langdale to Egmont.

The Site's proximity to local and regional bus service helps reduce car dependency and enable non-vehicle trips to the proposed Commercial Uses. It is anticipated that the active transportation improvements described below could require re-configuration of bus stop #170143, which would be designed as part of the Proposed Development's off-Site works. Such design would be in accordance with BC Transit's *On-Street Infrastructure Design Guide*, with consideration of the bus shelter types outlined in the *Transit Shelter Program*. Any proposed upgrades could indirectly encourage ridership uptake for other surrounding properties, supporting the Town's sustainability and transportation goals.

ACTIVE TRANSPORTATION & INTERSECTION IMPROVEMENTS

The Town's *Active Transportation Network Plan* envisions future cycling and pedestrian improvements along Sunshine Coast Highway as well as an intersection upgrade near the Town's western boundary. We anticipate that active transportation improvements could necessitate a highway dedication along the Site's frontage. This will be confirmed with MOTT following submission. The Proposed Development has been designed to be compliant with Town setback regulations regardless of a possible dedication.

The need for left-turn lanes at the Site's western entrance is supported by the potential for up to 549 vehicle trips per hour to and from the Proposed Development. The full Traffic Impact Assessment will include recommendations for design of this intersection.

SERVICING

WATER SUPPLY

Aplin & Martin Consultants Ltd. ("**AMC**") prepared a Conceptual Off-site Servicing Plan to illustrate how the Proposed Development would be served by off-Site utility infrastructure. Despite that the Site and other parcels surrounding Gibsons Way at Payne Road were incorporated into the Town in 2009, the Site remains serviced by a ⌀250 mm water main owned by SCRD (asset ID no. WMN-6257). Town and SCRD data conflict as to whether the pipe is constructed of PVC or ductile iron. Two existing ⌀19 mm connections would be demolished and replaced by a single ⌀200 mm connection near the proposed eastern driveway entrance.

SANITARY SEWER

There is currently a ⌀100 mm sanitary force main at the south side of Sunshine Coast Highway that extends beyond the Town's western boundary. It diverts to the north side of Gibsons Way via a ⌀200 mm PVC gravity main just east of Payne Road, then diverts east and continues for 328.4 m via a ⌀200 mm asbestos-cement gravity main to Mahan Road before diverting south towards Lower Gibsons. AMC modelled the downstream system capacity and anticipates that these mains will need to be upsized between the Site and Mahan Road, with an estimated cost of over $2 million. The Developer is aware that they may be responsible for these upgrades, subject to latecomer agreements and/or DCC credits (as discussed in the *DEVELOPMENT COST RECOVERY* section herein).

DRAINAGE

The Site is fronted by a roadside drainage ditch, likely originating from the construction of Sechelt Road (later renamed Sunshine Coast Highway) in the 1930s, or from its upgrade to a provincial highway in the 1960s. The ditch extends west from the southeast corner of the Site into SCRD jurisdiction and continues parallel to the highway. It collects stormwater from a ⌀600 mm PVC storm sewer main that discharges at a headwall near the southeast corner of the Site. The main collects stormwater from parcels upstream along Payne Road, south of Reed Road. To the west, the ditch collects stormwater up to the southwest corner of the Site. Drainage from the Site itself runs overland into the ditch, or into the on-Site stream. The ditch discharges into three culverts under the highway, which in turn charge a stream south of the Site in the Chaster Creek watershed.

The surveyed centreline of the ditch is ±1.5 m north of the paved edge of Sunshine Coast Highway. Active transportation improvements, whether or not necessitating an additional road dedication, would encroach into the ditch. It is anticipated that, to meet urban road design standards, the ⌀600 mm storm sewer main will be extended across the Site frontage and a new headwall will be constructed to collect stormwater from the ditch west of the Site. A Stormwater Management Plan prepared by AMC illustrates how on-Site drainage will be managed and directed into the Town's stormwater system, including provision of two on-Site detention chambers.

ELECTRICAL & TELECOMMUNICATIONS

Site Power Engineering Consultants Ltd. has reviewed the Proposed Development and the available loading data for Feeder 2553 GIB. Between April 2024 and March 2025, the feeder experienced a highest recorded average load of 247 A and a typical average winter load of 210-235 A. With the addition of the Proposed Development, peak total loading to the feeder would remain below B.C. Hydro's operating target of ±345 A for interconnected (open-loop) feeders (75% of the conductor's thermal capacity), ensuring backup supply during outages. As such, there appears to be sufficient electrical capacity for the Proposed Development without off-Site upgrades.

On-Site electrical and telecommunications infrastructure will be designed at the Development Permit stage for each phase of development. SRWs in favour of public utilities will be negotiated and drafted prior to subdivision approval.

WASTE REMOVAL

Waste storage enclosures are provided separately for each Apartment building, collectively for the Townhouse buildings, and collectively for Retail Buildings A-D. In the absence of local design guidelines, each enclosure will be designed in accordance with Metro Vancouver Regional District's *Technical Specifications for Recycling and Garbage Amenities in Multi-family and Commercial Developments* and with input from a local waste collection contractor. It is anticipated that the proposed Apartment and Commercial buildings will be served by private waste collection contracts while the Townhouses will be served by public curbside collection, however this will be determined at a later stage of design and in accordance with *Garbage and Organics Collection and Disposal Bylaw No. 1252, 2018*.

POSTAL SERVICE

Canada Post recently announced that it would terminate door-to-door delivery to residential addresses. This does not affect Apartment buildings with central mail facilities, so it is expected that the Residential Parcel will be served by community mailboxes, located outside for Townhouse residents and in the lobby of each Apartment building. Input on final mailbox locations will be sought from Canada Post at the Development Permit stage.

NATURAL ENVIRONMENT

RIPARIAN AREAS

One stream, as defined and regulated by *Riparian Areas Protection Regulation*, B.C. Reg. 178/2019 (**"RAPR"**) and *Water Sustainability Act*, S.B.C. 2014, c. 15 (**"WSA"**), traverses the Site from north to south, just east of the Lot Line between Lots A and 3 (**"Chaster Creek Tributary"**). It culverts under Sunshine Coast Highway and travels south, then west, before connecting to the main branch of Chaster Creek, ±1.9 km downstream from the Site. Statutory setbacks therefrom have been incorporated into the design of the Proposed

Development and are proposed to be protected by a no-build restrictive covenant registered under section 219 of the Land Title Act.

Mapping of natural features at the Site has varied over the years, as different data and methodologies have been used to assess the *likelihood* of the presence of such features, including streams and wetlands. SCRD Maps, Figure 1 of *One Water Strategy – Water Use Planning for Aquifer 560*, and Schedule D of repealed *Official Community Plan Bylaw No. 985, 2005*, all show the Chaster Creek Tributary entering the Site near its northeast corner before diverting west and then south along the boundary between Lots A and 3.

Map C-2 of the OCP suggests that there could be additional streams at the Site. A report prepared by Diamond Head Consultants Ltd. (“**DHC Report**”) for the Town during the development of the ESA DPA provides additional context based on a desktop study and very brief site visit. Specifically, Figure 5 suggests that there are two tributaries of an additional non-fish-bearing stream further west on Lot 3. It shows one such tributary originating as a distributary from the Chaster Creek Tributary, suggesting a breach of its bank. The other tributary supposedly originates near the centre of the north Lot Line of Lot 3, where standing water can accumulate seasonally due to overland runoff from 727 Payne Road.

A Site-specific Environmental Overview Assessment Report was prepared by Cascadia Biological Services (“**Cascadia**”) in October 2026 following site visits over several years. Despite the mapping representations made in the OCP, Cascadia confirms that there is no distributary from the Chaster Creek Tributary and that any drainage from 727 Payne Road is limited to overland runoff which does not meet the definition of a stream. It confirms that the only regulated natural feature on the Site is the Chaster Creek Tributary. The enclosed OCP Amendment application proposes to amend Map C-2 of the OCP to accurately reflect streams and riparian areas as defined therein.

Due to the extent of previous disturbances within the Chaster Creek Tributary’s Streamside Protection and Enhancement Area (“**SPEA**”), the recommended setback therefrom is 10 m. Since acquiring beneficial ownership of the Site, the Developer has re-naturalized portions of the SPEA by planting hundreds of trees above the stream’s natural boundary. A comprehensive Riparian Restoration Plan would be developed in support of a future Development Permit application to further restore the SPEA to a more naturalized state.

Following the correction to Map C-2, the Freshwater and Riparian Areas sub-area within the ESA DPA would apply to the Chaster Creek Tributary and a 30 m buffer area on either side of its top of bank (“**TOB**”). The stated objective of the Freshwater and Riparian Areas sub-area is “to provide shade to watercourses, stabilize watercourse banks to prevent erosion, [and] support nutrient inputs into the watercourse to support riparian habitat.” Currently, a majority of the SPEA on the east side of the stream is disturbed by asphalt and permanent structures. Vegetated areas on both sides of the stream have evidently been disturbed as well, and are invaded by dominant, non-native flora such as *Rubus armeniacus* (Himalayan blackberry) and *Equisetum* (horsetail). The proposed 10 m setback and restoration therein would improve the overall ecological function of the riparian area and meet the foregoing DPA objectives. While support in principle is requested in conjunction with the enclosed applications, a formal Development Permit application will be made at a later stage and prior to land alterations within the DPA.

Section 3.3.1 of the Zoning Bylaw regulates setbacks from Watercourses, defined as “any natural or man-made depression with well defined banks and a bed of 0.6 metres (1.6 feet) or more below the surrounding land…”. This definition takes a more prescriptive approach than RAPR and WSA, which do not define streams based on quantitative physical characteristics. Staff previously advised that tributaries to named Watercourses fall under the description of “all other creeks” in section 3.3.1.5, requiring a setback of 5 m from the Chaster Creek Tributary. This is exceeded by the proposed 10 m setback and additional 1.5 m transitional area.

One new stream crossing is proposed, approximately northeast of Retail Building C and west of Retail Building D. The crossing would support both vehicular and pedestrian traffic and would require the Chaster Creek Tributary to be culverted under the crossing structure. Detailed design of the culvert and crossing will occur prior to notifying the provincial government of the proposed works. It is anticipated that the culvert will have a diameter of ⌀1200 mm and be constructed with corrugated plastic or metal piping. These works are authorized pursuant to section 39(1)(a) of *Water Sustainability Regulation*, B.C. Reg. 36/2016 and do not require a time-intensive approval process.

SENSITIVE ECOSYSTEMS

In addition to Freshwater and Riparian Areas, a Terrestrial Ecosystems sub-area overlies most of the unimproved and unpaved portions of the Site. Despite acknowledging that "many of Gibsons' original forests were harvested in the past century", section 4.2 and Figure 4 of the DHC Report designate all natural areas of tree canopy in the Town as Terrestrial Ecosystems. On the Site, this consists of mostly deciduous vegetation, with a small area of mixed deciduous/coniferous, Blue List ecosystem at the north end of Lot 3. In January 2025, during the wet season, Cascadia surveyed this area for indicator species—specifically deer fern, three-leaved foam flower, and skunk cabbage. No meaningful population of these species was found in the area, leading Cascadia to conclude that the area does not visually reflect a Blue List ecosystem and does not warrant particular protection from development.

MATURE TREES

Lot 3 and the northern end of Lot A are densely vegetated, primarily with small trees and undergrowth which provide relatively little ecological value. *Tree Preservation Bylaw No. 1282, 2020* ("**Tree Bylaw**") defines Protected Trees as trees with a minimum diameter at breast height ("**DBH**") of 10-30 cm, depending on species and location.

Public aerial imagery indicates that a majority of the Site was cleared by 1967. Alterations related to land development likely go back much further to around the time that District Lot 690 was pre-empted by Mr. John Payne in April 1888. This suggests that most vegetation on the Site is immature secondary growth that has occurred in recent years since the Site became uninhabited.

An Arborist Report and Tree Management Plan prepared by Beechwood Landscape Services in September 2026 provides an inventory of all Protected Trees on and nearby the Site. The report identifies a total of 297 on-Site and nine off-Site Protected Trees, of which, 215 (70.3%) are recommended for removal, while 91 (29.7%) are proposed to be retained. Summaries of the Protected Trees' health, structures, and retention values are outlined in Tables 4 and 5, below.

Table 4. Trees Proposed for Retention

Location	Structure/Health Rating					
	Good	Good/ Moderate	Moderate	Moderate/ Poor	Poor	Total
On-site (Developable Area)	-	-	-	-	-	**-**
On-site (ALR Setback)	-	6 (2.0%)	39 (12.7%)	-	-	**45 (14.7%)**
On-site (SPEA)	-	12 (3.9%)	29 (9.5%)	-	-	**41 (13.4%)**
Off-site (Private Property)	-	2 (0.7%)	3 (1.0%)	-	-	**5 (1.6%)**
Off-site (Town Lands)	-	-	-	-	-	**-**
Total	**-**	**20 (6.5%)**	**71 (23.2%)**	**-**	**-**	**91 (29.7%)**

Table 5. Trees Proposed for Removal

Location	Structure/Health Rating					
	Good	Good/ Moderate	Moderate	Moderate/ Poor	Poor	Total
On-site (Developable Area)	-	87 (28.4%)	104 (34.0%)	9 (2.9%)	-	**200 (65.4%)**
On-site (ALR Setback)	-	1 (0.3%)	10 (3.3%)	-	-	**11 (3.6%)**
On-site (SPEA)	-	-	-	-	-	**-**
Off-site (Private Property)	-	-	4 (1.3%)	-	-	**4 (1.3%)**
Off-site (Town Lands)	-	-	-	-	-	**-**
Total	**-**	**88 (28.8%)**	**118 (38.6%)**	**9 (2.9%)**	**-**	**215 (70.3%)**

Where the Proposed Development may require removal of Protected Trees that are located wholly or partially off-Site, CityState will work with the owners of affected lands to obtain such permission and establish appropriate re-planting and/or other privacy measures.

Section 5.2 of the Tree Bylaw requires that Replacement Trees, or cash in lieu thereof, be planted for each Protected Tree that is cut or removed from the Site. Specifically, two Replacement Trees are required for each Protected Tree cut or removed, except that three Replacement Trees are required for each Protected Tree on a lot located within DPA #1: Geotechnical Hazard Areas and DPA #2: Environmentally Sensitive Areas of repealed *Official Community Plan Bylaw No. 985, 2005*. These DPAs are effectively succeeded by the GH and ESA DPAs in the current OCP, although a bylaw amendment is necessary for section 5.2.3 of the Tree Bylaw to affect such lands.

For the foregoing reasons, 430 Replacement Trees would be required to account for the 215 Protected Trees proposed to be removed from the Site. Should the Tree Bylaw be amended prior to issuance of a Tree Cutting Permit, the number of required Replacement Trees will be calculated according to the bylaw as amended. The Developer requests that previous SPEA plantings (of which they will provide documentation) are credited towards the required number of Replacement Trees.

SUSTAINABILITY

The Developer is committed to constructing the Proposed Development with an emphasis on embodied and operational sustainability. The provision of ALR and riparian setbacks protects over 18.6% of the Site—±3.72 times more naturalized open space than the statutory 5% park land requirement (see *PARK LAND PROVISION* section herein). Where possible, paved areas may also be constructed with permeable materials, allowing natural groundwater regeneration and maintaining pre-development inflow rates to the Chaster Creek Tributary.

Part 15 of *Building Bylaw No. 1284, 2020* (“**Building Bylaw**”) requires that all buildings in the Proposed Development meet the minimum performance requirements specified in Step 1 of the Energy Step Code. However, sentences 9.36.6.3 and 10.2.3.3 of BCBC 2024 require that all buildings constructed under Part 9 thereof comply with Step 3 and that buildings that fall under Part 3 comply with Step 2. For the Proposed Development, this means that the Townhouse buildings will meet or exceed Step 3, while the Apartment and non-Residential buildings will meet or exceed Step 2. This represents a performance improvement of approximately 10-30% compared to the requirements of the Building Bylaw. Precise operational performance will be modelled at the Building Permit stage and summarized in a pre-construction Energy Compliance Report. In addition to reduced greenhouse gas emissions and power demand, this improved efficiency will create long-term cost savings for residents.

The Proposed Development also includes ecologically sustainable features, such as primarily indigenous and drought-tolerant landscape plantings, a lineal rain garden to capture stormwater runoff, and the protection of the Chaster Creek Tributary.

GEOTECHNICAL

GEOTECHNICAL

A Geotechnical Investigation Report was completed by GeoPacific Consultants Ltd. following site visits in June 2024 and February 2026. A total of six solid stem auger text holes were drilled to 7.6 m below existing grades and were supplemented by dynamic cone penetration test (DCPT) soundings and completed as groundwater monitoring wells.

The report finds that the existing soils are not liquefiable and can support the Proposed Development on conventional pad and strip foundations.

HYDROGEOLOGY

GeoPacific Consultants Ltd. completed all six test holes as groundwater monitoring wells, which are supplemented by three monitoring wells installed by Keystone Environmental Ltd. in 2019-20. These wells indicate that perched groundwater levels wells vary seasonally, appearing in two distinct layers at respective depths of 131.3-133.7 m and 126.1-127.7 m geodetic. This perched groundwater can be

managed using conventional de-watering methods during construction, and with a perimeter drainage system post-construction. Static groundwater was not encountered during the investigation and is expected to be present ±100 m below the Proposed Development in Aquifer 560.

INDIGENOUS CONTEXT & ARCHAEOLOGY

The Site is located within the ancestral territory of Skwxwú7mesh Úxwumixw ("**Squamish Nation**"), which extends west to Roberts Creek. The B.C. Archaeology Branch responded to a data request in May 2026, confirming that "there are no known archaeological sites recorded on the subject property." CityState and the Developer will consider the Squamish Nation's referral input upon receipt. We are committed to collaboration throughout all stages of development.

PUBLIC CONSULTATION

CityState and the Developer are committed to early and ongoing engagement. We employ a mix of methodologies to engage neighbours and solicit feedback about our projects.

PRO-ACTIVE COMMUNICATION

CityState takes an open-door approach to public engagement, sharing direct contact information with stakeholders so that we are accessible when they want to ask questions or provide input. All feedback is summarized in a Public Engagement Summary Report for Council's consideration prior to Public Hearing.

PUBLIC INFORMATION MEETING

Public Information Meetings ("**PIMs**") provide an opportunity for the public to learn about the Proposed Development, ask questions to members of the project team, and provide written and verbal feedback that can be considered for implementation into the project design. It is expected that at least one PIM will be hosted prior to Public Hearing. CityState has hosted dozens of successful PIMs in communities throughout the Lower Mainland and Sunshine Coast.

WEBPAGE

For complex projects, CityState often creates a dedicated page on our website where the public can view the latest application materials and project status. It also provides an opportunity for stakeholders to leave feedback or reach out directly with their questions.

FINANCIAL CONSIDERATIONS

DEVELOPMENT COST RECOVERY

Development Cost Charges Bylaw No. 1329, 2025 ("**DCC Bylaw**") imposes Development Cost Charges ("**DCCs**") for most development within the Town. Applicable DCC rates for the Proposed Development are $20,048.38 per Dwelling Unit and $146.40 per square metre of Gross Floor Area plus $113,849.36 per net hectare of land for Commercial Uses. This results in estimated total DCCs of over $10 million from the Proposed Development. Exact DCCs will be determined prior to issuance of Building Permits for each phase of development and could change based on the prevailing DCC rates at such time and the provision of creditable off-Site works completed by the Developer. It is specifically noted that DCC project nos. T-06, D-05, and S-05 may overlap with off-Site works required for the Proposed Development.

AMENITY COST RECOVERY

The Town's *Community Amenity Contribution Policy* ("**CAC Policy**") establishes target rates for voluntary contributions to the Town's Affordable Housing Reserve Fund and General Community Amenity Contribution Reserve. The target rate for multi-family development is $5,000 per Dwelling Unit, equating to $2,180,000 for the Proposed Development.

Housing Statutes (Development Financing) Amendment Act, 2023, S.B.C. 2023, c. 46 grants local governments authority to establish amenity cost charges ("**ACCs**") to replace negotiated, site-specific amenity cost recovery schemes. At the Special Council meeting of November 18, 2025, Council directed staff to prepare a bylaw to establish ACCs within the Town ("**ACC Bylaw**"). Like DCCs, applicable CAC/ACC rates will be determined at the Building Permit stage and are subject to credits for prescribed non-cash contributions.

PARK LAND PROVISION

Section 510 of the LGA authorizes local governments to require that up to 5% of lands proposed for subdivision, or an equivalent cash value thereof, are provided to the local government for park land purposes. The Town states in its *Subdivision Application Guide* that it will exercise this authority. Five percent of the Site area equates to ±3,034 m², while 5% of its 2026 assessment value is $421,950.

Map A-1 of the OCP identifies a "conceptual park" on the west side of the Site. Section 12 of the OCP sets out further policies regarding Town acquisition of future parks. It discusses standards for community parks and neighbourhood parks, both of which are intended to accommodate a variety of space-intensive uses such as a sports fields and playgrounds. They are also intended to be centrally located within neighbourhoods, which is not the case for the Site—being situated at the Town boundary and adjacent to ALR- and Industrial Commercial-designated lands to the north, west, and south, and Gibsons Park Plaza to the east. We do not believe that the Site is suitably sized or located to provide a community or neighbourhood park as defined in the OCP.

The Proposed Development includes ±6,974 m² of lands (comprised of the Chaster Creek Tributary and its SPEA) which may either be dedicated to the Town for park purposes or protected by restrictive covenant and retained by the Developer. This exceeds the statutory requirement under the LGA by ±130% and is appropriate for the scale of the Proposed Development. Feedback from staff and Council will inform final park land contributions.

OTHER FINANCIAL CONSIDERATIONS

In addition to DCCs and ACCs, other financial considerations include:

- development application and permit/inspection fees;
- non-creditable off-Site improvements;
- increased taxable property value; and
- increased business licence fees.

CONCLUSION

The Proposed Development presents a considerable opportunity for Gibsons to deliver upon its housing needs without significantly disrupting existing neighbourhoods or residents. A thorough review of applicable plans, policies, reports, bylaws, and legislation informed the enclosed applications, of which we appreciate your consideration. We look forward to presenting our proposal to Council at a future meeting. Correspondence related to these applications can be directed to Aidan Shirley, Development Manager, at aidan@citystate.ca.

SCHEDULE 'A' – PROPOSED BYLAW AMENDMENT MAP



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