

Attn: Mr. Ian Holl, Manager, Development Planning
 Planning and Development Services Division
 District of Sechelt
 2nd Floor, 5797 Cowrie Street
 Sechelt, BC V0N 3A0

June 7, 2024

Dear Mr. Holl,

Re: Letter of Intent for OCP Amendment & Rezoning Application (5926 Shoal Way)

On behalf of 1352952 B.C. Ltd. (the “Owner”), CityState is pleased to present a joint OCP Amendment and Zoning Amendment application for 5926 Shoal Way (the “Site”). The intent of the proposed bylaw amendments is to facilitate the development of 13 slab-on-grade buildings comprised of 63 Townhouse units.

The proposed development includes a combination of unit sizes ranging from two to four bedrooms, meant to meet the needs of families and the local workforce. It also proposes protection of a 0.86 ac Environmental Protection Area.

The purpose of this letter is to provide an overview and planning rationale for our application for staff and Council’s consideration. 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	1352952 B.C. Ltd.	James Liu	jamesliu@royalpacific.com
Applicant	CityState Consulting Group	Aidan Shirley	aidan@citystate.ca
Planner	CityState Consulting Group	Aidan Shirley	aidan@citystate.ca
Architect	Aplin & Martin Consultants	Homayoun Rad	hrad@aplinmartin.com
Landscape Architect	Ekistics	Joe Zhou	zhou@ekistics.ca
Arborist	Diamond Head Consultants	Mike Coulthard	mike@diamondheadconsulting.com
Biologist	Diamond Head Consultants	Mike Coulthard	mike@diamondheadconsulting.com
Surveyor	Aplin & Martin Consultants	Homayoun Rad	hrad@aplinmartin.com
Civil Engineer	Gwaii Engineering	Josh Bartley	jbartley@gwaiieng.com
Geotechnical Engineer	GeoPacific Consultants	Matt Kokan	kokan@geopacific.ca

Sincerely,



Aidan Shirley
 Development Manager, CityState Consulting Group

BACKGROUND

The Site is 16,548 m² (4.09 ac) and is surrounded by vacant land to the north and Single-Detached Dwelling uses to the south, east, and west. There is also a 10 m unopened road allowance to the west of the site, just east of 5960 Shoal Way. The property is improved with one Single-Detached Dwelling built circa 1994 and multiple small, accessory structures.

The north portion of the Site is encumbered by a Provincially protected network of streams and wetlands. Many of these features are man-made and will be protected in their existing condition as part of the proposed development. It is anticipated that this area will remain as part of the Site to be owned by the strata corporation, as it provides little useful value to the District of Sechelt (the “District”). The Owners are open to discussing the future ownership of this area if the District feels differently.

CityState, the Owners, and the project’s design team participated in a pre-application meeting with Ian Holl, Sven Koberwitz, and Meghan Lee on September 8, 2023, and have corresponded continually with District staff since then to compile an application that meets the District’s vision for redevelopment. We hope that this application can be considered promptly by Council for Permission to Proceed.

It should be noted that this is CityState’s third application in West Porpoise Bay, following active applications for 5981 Shoal Way and 5875 Reef Road. These three projects are separately owned and CityState’s involvement in each project is limited to a consulting capacity.

LAND USE

OFFICIAL COMMUNITY PLAN

District of Sechelt Official Community Plan Bylaw No. 492, 2010 (the “OCP”) designates the Site as Residential. OCP [policy 5.6](#) states that “intensive residential use [including] ground-oriented attached housing forms such as townhouses or row houses” may be considered for Residential-designated lots. Generally, these lots must have an area over one acre or be compatible with surrounding uses to be considered for such uses. These sites are allowed the provisions of Density Level 4, as defined by [Figure 17](#), which include:

- Max. 0.75 FAR
- Max. 35 UPH
- Max. 3 storeys

Updates to Figure 17 have been proposed by staff and granted first and second readings by Council. Proposed [District of Sechelt Official Community Plan Amendment Bylaw No. 492-35, 2023](#) (the “OCP Density Updates”) contemplates increasing the maximum Floor Area Ratio (“FAR”) to 1.00 and removing the Units Per Hectare (“UPH”) limitation for the Residential designation. If the OCP Density Updates are adopted by Council and enacted prior to adoption of the subject bylaw amendment application, the proposed development would not require an OCP Amendment. CityState has previously stated our support for the OCP Density Updates, as they will enhance consistency between District land use policy and Council’s stated desires for housing forms in new developments.

ZONING

District of Sechelt Zoning Bylaw 580, 2022 (the “Zoning Bylaw”) designates the Site as [Residential Two Zone – Low Density \(R2\)](#). To facilitate the proposed development, we propose to amend the zoning designation to [Residential Five Zone – Medium Density \(R5\)](#). We believe that the regulations of the R5 zone provide an appropriate baseline for the proposed development, except that the following site-specific regulations are requested and required:

1. Maximum density is 38 Dwelling Units per ha;
2. Minimum Setback from a Lot Line abutting private property or a Highway other than a Lane is 1.5 m;
3. Minimum Setback from a Lot Line abutting a Lane is 0.0 m;
4. Minimum number of off-street Parking Spaces for visitor use is 1.

A site-specific regulation for Lot Width may be required should staff interpret the application of this term differently than assumed.

PROJECT STATISTICS

A full summary of the proposed development's statistics is outlined below. Red font indicates the need for a site-specific regulation to accommodate the proposed development.

Specification	Bylaw Requirement	Proposed	Δ
Lot Area	≥4,000 m ²	16,548 m ²	+12,548 m ²
Lot Width	≥20 m	128.02-199.34 m	+108.02 m
Lot Coverage	≤50%	23%	-27%
Units Per Hectare (UPH)	≤35	38	+3
Unit Count	≤58	63	+5
2-bedroom	-	29	-
3-bedroom	-	23	-
4-bedroom	-	11	-
Gross Floor Area (GFA)	≤9,929 m ²	7,656 m ²	-2,273 m ²
Floor Area Ratio (FAR)	≤0.60	0.46	-0.14
Building Height	≤10.5 m	10.5 m	-
Vehicle Parking	≥139	126	-12
Resident	≥126	126	-
Visitor	≥13	1	-12
Bicycle Parking	≥76	77	+1
Long-term	≥63	63	-
Short-term	≥13	14	+1
Front Lot Line Setback	≥5.0 m	0.0-1.5 m	-5.0 m
Side Lot Line Setback (Interior)	≥1.5 m	1.5 m	-
Side Lot Line Setback (Exterior)	≥3.0 m	1.5-5.0 m	-1.5 m
Rear Lot Line Setback	≥5.0 m	0.0-6.0 m	-5.0 m

LOCATION & DEVELOPMENT CONTEXT

The Site is located north of Shoal Way at the north end of Reef Road. Active development applications in the neighbourhood include 117-unit and 49-unit Townhouse projects (also managed by CityState), three Subdivision applications totalling 71 new lots north of Ripple Way, and a two-lot Subdivision application south of the Site on Reef Road. The prevalence of large lots in the neighbourhood which are designated Residential or Special Infill in the OCP presents an opportunity for future multi-family infill development.

The Site is located within walking distance of excellent amenities, including Kinnikinnick Elementary School, Sunshine Coast Arena, Suncoast Racquet Club, Blue Ocean Golf Club, Little Scholars Child Care, Sechelt Life Community Church, several sports fields, and abundant passive and activated public park space. The Site is ideally situated to promote a vibrant, well-rounded quality of life.

HOUSING NEEDS

UNIT TYPOLOGIES

[Figure 29](#) of the *Sunshine Coast Housing Needs Report* ("SCHNR") states that 75% of Sechelt dwellings are single-detached dwellings, while [Table 8](#) shows that 68% of Building Permits issued by the District from 2015-2019 were for single-family dwelling units. Housing trends in Sechelt show that the market for Single Detached Dwellings continues to outpace multi-family housing forms, despite the marked need for smaller unit sizes (see [Table 40](#)) and considerable affordability gap between detached and attached typologies (see [Table 15](#)).

The proposed development includes four unique unit layouts ranging from 109.6-139.4 m² (1,180-1,500 ft²). These include 29 two-bedroom units, 23 three-bedroom units, and 11 four-bedroom units. These units will provide opportunities for larger household typologies (typically 2+ individuals) to establish roots in Sechelt with room to grow into a family-sized unit. The selection of unit sizes represents the most balanced unit mix of CityState's three applications in West Porpoise Bay (the other two being located at [5981 Shoal Way](#) and [5875 Reef Road](#)). The 29 two-bedroom units will complement Phase 1 of our development at 5981 Shoal Way, which delivers 28 compact two-bedroom units targeted towards the middle-income workforce, including teachers, first responders, tradespeople, and healthcare workers. The 34 three- and four-bedroom units are similar to those provided at 5875 Reef Road and are targeted at family-oriented households who cannot afford a detached housing unit or prefer the community of a multi-family development.

We believe that these housing typologies complement the surrounding form and character while delivering much-needed densification in an amenity-rich neighbourhood.

HOUSING TENURES

All units in the proposed development are market ownership units. This reflects the desire that families and young professionals have to enter the housing market when considering the Sunshine Coast as their long-term home.

DESIGN

SITE LAYOUT

District staff indicated at the outset of the project that the northward extension of Reef Road through the Site and adjacent properties to Ripple Way would be required as a condition of staff support for redevelopment of the Site. A road alignment that meets District of Sechelt Subdivision and Development Control Servicing Standards Bylaw No. 430, 2003 ("SDCSS Bylaw") standards and aligns continuously with Reef Road to the south and Gale Avenue South to the north set the foundation for a Site Plan that includes the 13 proposed Townhouse buildings. Through further discussions with District staff, the Site Plan was revised to maximize building frontages and a friendly streetscape along Reef Road, requiring vehicle access from a rear lane or strata road. The dedications of Reef Road and public lane access to Buildings 1-10 significantly impacted the proposed development and necessitates site-specific zoning regulations 2-4 listed in the ZONING sub-section of this letter. Further description of the proposed road dedications is discussed in the ACCESS & TRANSPORTATION section of this letter.

ARCHITECTURE

Aplin & Martin Consultants is the Architect of record for the project. The enclosed Architectural Plans & Drawings include a Site Plan, Project Statistics, Floor Plans, Roof Plans, and Building Elevations. Renderings will be provided prior to consideration of the project by Council or Advisory Planning Commission ("APC").

All units in the proposed development are three storeys, including a private, enclosed garage on the ground floor and two storeys of living space above. Each unit will also have a self-contained rooftop patio to provide useable outdoor space for residents. The dimensions of these spaces will be confirmed at the Development Permit stage of the project and are expected to meet Development Permit Area ("DPA") #7 guidelines for minimum patio and balcony provisions per bedroom in each unit.

The high-level Architectural inspiration for this project is a modern, West Coast-inspired theme, with coastal colours and materials and varied roof lines. The OCP provides guidelines for the form and character of new multi-family developments within DPA #7. Detailed design considerations will be made at the Development Permit stage of this project to meet these guidelines.

LANDSCAPING

A Landscape Plan prepared by Ekistics includes a mix of native, drought-tolerant plant species. Several proposed plant species are also pollinator-friendly and/or suitable for planting in rain gardens, underscoring the project's sustainability principles.

Several areas throughout the site are proposed for social activation, including meandering pathways, benches, rain gardens, play areas, and features such as fountains and trellises.

AMENITIES

Private patio and balcony spaces will be provided in accordance with DPA #7 guidelines. Due to the separation of the development areas caused by the requisite road allowances, common amenity areas are limited to the small social nodes mentioned in the LANDSCAPING sub-section of this letter. It is not anticipated that more substantial common amenity spaces would be well used; such spaces would also increase purchase and operational costs for residents, decreasing the affordability of the proposed units.

ACCESS & TRANSPORTATION

ROAD EXTENSIONS

We understand that the District is currently undertaking a Transportation Master Plan review and update in consultation with Stantec. District staff have suggested that a new vision is forthcoming for the neighbourhood road network in West Porpoise Bay, which includes a northward extension of Reef Road to connect to Gale Avenue South at Ripple Way, reducing long-term traffic flow along Shoal Way. The enclosed Site Plan shows a 20 m cross-section for Reef Road based on the [SR-5](#) (“Urban Local Road”) standard in the SDCSS Bylaw, which District staff indicated to be the appropriate cross-section for this road.

The proposed road dedications, including Reef Road and the parallel public lane to the east, comprise a total of 4,401 m², or approximately 27% of the Gross Site Area. District staff have stated that these road allowances should be constructed by the Owner and dedicated to the District. The enclosed Site Plan shows the extent of the proposed roadworks, up to the west side of the adjacent 10 m unopened road allowance. Preliminary cost estimates for these roadworks are in the order of millions of dollars. Approximately 236.59 m² (2,546.62 ft²) of land from the adjacent property at 5960 Shoal Way is required to complete the full 20 m road width to the north property line of the Site. The Owner will not negotiate directly with the owner of this property, as it creates an undue burden, financially and temporally, for the proposed development. It is expected that the 10 m half-road provision will be sufficient to allow two-way vehicle travel for the foreseeable future until the District acquires the remaining 10 m from the neighbouring owner. A 10 m half-road provision was previously deemed acceptable for the Links Street extension required for our project at 5981 Shoal Way. The District already owns the 20 m road allowance needed to complete the road connection northward to Ripple Way.

VEHICLE ACCESS

Vehicle access to the proposed development will be from the Reef Road extension to the north and from either Reef Road or the proposed laneway to the south. Twenty-two of the proposed units (18 on the west side of the Site and four on the east side of the Site) are accessed directly from a private site road. A Trip Generation Report will be completed and provided prior to a Public Hearing (if required) or third reading. The requirements for a full Traffic Impact Study are not met based on the number and typological classification of units in the proposed development.

PARKING

All units in the proposed development include two enclosed parking spaces for private resident use. The availability of 33 on-street parking spaces renders the provision of off-street visitor parking spaces redundant and burdensome, especially given that the utilization of these parking spaces is not expected to reach capacity. These 33 parking spaces include three accessible parking spaces designed in accordance with [sections 3.4 and 3.5](#) of the Zoning Bylaw. One off-street accessible visitor parking space is located adjacent to the proposed public lane in the eastern portion of the Site to ensure accessibility to all units. The siting of required parking spaces for visitor use within the Reef Road right-of-way (“ROW”) requires a site-specific zoning regulation for the proposed development. Parking spaces within public road ROWs will not be marked for the exclusive use of visitors to the proposed development. Rather, all 33 parking spaces will be available to all potential users, which is expected to account for the shortage of visitor parking on the Site.

PUBLIC TRANSPORTATION

The subject site is located ±33 m and ±129 m from northbound and southbound bus stops, respectively. These stops are served by the number 3 bus route, running from Sechelt Arena to the Downtown core. Service is infrequent, running approximately every 1.5 hours. Inquiries to BC Transit regarding the frequency of service and quality of bus stop infrastructure remain without response.

ACTIVE TRANSPORTATION

A variety of amenities are accessible within walking distance, including a school, daycare, church, parks, and recreational facilities. The proposed development is also a 10-minute bicycle ride from the centre of Downtown. Reef Road was recently widened to accommodate a new bike line, which will enhance cyclist safety and connectivity to the site.

Provision of 14 short-term bicycle parking spaces and enclosed long-term bicycle parking within garages encourages active transportation and exceeds the 13 short-term bicycle parking spaces required under [section 3.7.4](#) of the Zoning Bylaw.

SERVICING

UTILITIES & ELECTRICAL

A Conceptual Site Servicing Plan has been prepared by Gwaii Engineering. Underground water, sanitary, drainage, and electrical mains are proposed under Reef Road and the proposed lane ROW. Two Pad-Mounted Transformers (“PMTs”) are proposed—one on either side of Reef Road. Final, detailed servicing drawings will be completed at the Development Permit stage.

WASTE COLLECTION

Forty-one (65%) of the proposed units are accessed from a public lane ROW, while the other 22 units (35%) are accessed from private site roads. It is possible that a combination of public and private waste collection contracts will be required to serve the proposed development. This will be determined at the Development Permit stage when considerations such as phasing and road accesses are finalized. If private collection is necessary, CityState will engage AJM Disposal Services Ltd. (“AJM”) to provide feedback with respect to waste collection and staging. At present, the proposed development is designed to allow for curbside collection to the east of Reef Road and a common collection area on the west side of Reef Road.

POSTAL SERVICE

One community mailbox is proposed on each side of Reef Road, each adjacent to a public road ROW. Final locations will be determined pending input from Canada Post.

ENVIRONMENT

MATURE TREES

An Arborist Report and Tree Inventory Plan completed by Diamond Head Consultants identifies 54 Protected Trees on the Site, as defined under [section 2](#) of *District of Sechelt Environmental Management and Protection Bylaw No. 484, 2009* (the “Environmental Management and Protection Bylaw”). No off-site Protected Trees are expected to be impacted by the proposed development. In total, 17 Protected Trees (31%) are identified for retention, while 37 (69%) must be removed to accommodate the proposed development and roadworks. Of the 37 Protected Trees proposed for removal, 14 (38%) are within a proposed public road ROW, and a further nine (24%) have a Tree Protection Zone which encroaches into a proposed public road ROW. These 23 trees are exempt from the Environmental Management and Protection Bylaw under [section 5\(f\)](#) of same. Only 14 Protected Trees (38% of removed trees; 26% of total Protected Trees) must be removed for the sole purpose of accommodating the proposed development. [Section 14\(a\)](#) of the Environmental Management and Protection Bylaw requires that Replacement Trees are planted at a 1:1 ratio. Native tree replanting will occur within the proposed development (see Landscape Plan). A cash-in-lieu contribution may be required, depending on the caliper of proposed tree plantings.

ENVIRONMENTAL PROTECTION AREA

A 0.86 ac area towards the north end of the Site is Provincially protected due to the presence of two man-made ponds, one wetland complex, and several man-made ditches. A Watercourse Assessment Report completed by Diamond Head recommends that the minimum setbacks required under the Riparian Areas Protection Regulation (“RAPR”) are applied to these features. Aside from the demolition of existing structures, no works are proposed in this area. The area will be protected by covenant and fenced off from public access. It is anticipated that this area will remain as part of the Site to be owned by the strata corporation, as it provides little useful value to the District—although this is ultimately subject to decision by Council.

ENERGY EFFICIENCY

Until May 1, 2023, the District required that new buildings meet or exceed Step 1 of the *BC Energy Step Code* (the “Step Code”). Thereafter, the Provincial government mandated that all new buildings meet or exceed parameters equivalent to Step 3 of the Step Code. The proposed development conforms to these requirements, as also stipulated under [section 20.1](#) of *District of Sechelt Building Bylaw No. 409, 2003*.

GEOTECHNICAL

[Schedule E1](#) of the OCP identifies localized areas of the Site to be within DPA #5 (Steep Slopes). A Geotechnical Investigation Report was completed by GeoPacific Consultants following a site visit in January 2023. The report assessed the feasibility of multiple wood frame townhouse structures with at-grade paved parking. Nine solid stem auger test holes were advanced to depths of 4.6 m below grade. Static groundwater was not encountered during the investigation and is expected to be present well below proposed development grades. The report states that some imported fill is likely to be required during re-grading and that “the proposed redevelopment is feasible, provided the recommendations outlined in this report are incorporated into the overall design and construction.”

ARCHAEOLOGY

A Data Request has been submitted to the BC Archaeology Branch to confirm the absence of recorded archaeological findings on the Site. The results of this data request will be provided to the District once received. It is expected that the subject application will be referred to the shíshálh Nation (the “Nation”) for comment. CityState and the Owner will consider input from the Nation upon receipt.

PUBLIC CONSULTATION

CityState and the Owner are committed to early and ongoing engagement. We employ a mix of methodologies to engage neighbours and solicit feedback about our projects. It is expected that a combination of in-person and online engagement methods will be used throughout the lifetime of this project.

CONCLUSION

The enclosed joint OCP Amendment and Zoning Amendment application for 63 Townhouse units represents a considerable contribution to address Sechelt’s housing needs. Careful consideration has been taken to design a project that delivers a balanced mix of two-, three- and four-bedroom unit sizes, geared towards families and everyday workers. The proposed development also delivers public road and utility extensions and protection of a 0.86 ac Environmental Protection Area. We appreciate your review of our application and are available to respond to comments or questions at any time. We look forward to presenting this proposal to Council and APC. Correspondence related to this application can be directed to Aidan Shirley, Development Manager, at aidan@citystate.ca.