



Gabriola Island Local Trust Committee
and Islands Trust Northern Office Staff
700 North Road
Gabriola Island, BC
V0R 1X3

January 15, 2020

RE: Rezoning / OCP Amendment Application – Paisley Place – Lots 1 and 2

On behalf of the Gabriola Housing Society (GHS), I am pleased to submit a rezoning and OCP amendment application for Lot 1 and Lot 2 on the north and east sides of Paisley Place. Combined, the two lots are 2 hectares (5 acres), and our intent is to consolidate the lots post rezoning.

The proposed rezoning / OCP amendment would allow for a multi-dwelling affordable rental housing project of 24 homes to be developed, owned, and operated by GHS. The housing will serve residents with low to modest incomes who are struggling to find suitable, secure, affordable, rental housing. Approximately seventy percent of the homes will be rent-controlled, and approximately thirty percent will be market rental housing, thus meeting the requirements of funders such as BC Housing, and creating a diverse and healthy mixed-income neighbourhood.

We are proposing rezoning from the current Institutional 3 (IN-3) Zone to a new Multi-dwelling Affordable Housing zone, along with other important Official Community Plan (OCP) amendments to make building of affordable rental housing by GHS on Paisley Place possible.

This proposal merits approval for many key reasons:

- This proposal contributes to achieving one of the three main goals in the Islands Trust Policy Statement: to “*sustain island character and healthy communities*,” and identifies the importance of affordable housing as part of a healthy community. Specifically, Policy Directive 5.8.6 states:

Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address their community's current and projected housing requirements ...

- The proposal offers a specific opportunity for the Local Trust Committee to implement the purpose of its “Housing Options and Impacts Review Project – Phase 2” (adopted July 2019):

The purpose of this Project is “To increase housing options on Gabriola Island through Official Community Plan (OCP) policies and Land Use Bylaw (LUB) regulations, in a manner which supports the Object of the Islands Trust, strengthens relations with Snuneymuxw First Nation, and builds on the findings of the 2018 Northern Region Housing Needs Assessment”.

As identified below, there is a distinct lack of affordable housing on Gabriola. The GHS proposal supports the achievement of the Islands Trust Policy Directive and the Gabriola Local Trust Committee’s Housing Project, while still being consistent with the Island Trust’s broad preserve and protect mandate.

- It is well recognized by the Gabriola community that finding and retaining affordable housing is a significant challenge. Many conversations addressing community issues over the past 10 years named the lack of affordable housing a priority, from the Health and Wellness Collaborative to Sustainable Gabriola to the Village Vision work to a myriad of other conversations in public meetings and at kitchen tables across the island. Studies have identified the need for more affordable housing on Gabriola, including People for a Healthy Community’s “Affordable Housing Strategy” in 2012, and GHS’s Affordable Housing Forum in May 2018.
- The Island Trust’s own “Northern Region Housing Needs Assessment” reported the following important findings:
 - The key housing need is for safe, secure, affordable **rental** housing.
 - Gabriola has a very low proportion of rental housing supply – 17% (RDN – 26%, BC – 32%).
 - The majority of Gabriola’s rental housing supply is unaffordable – 52% pay more than 30% of total household income (RDN – 48%, BC – 43%).
 - More than half of the Gabriola households who rent face a core housing need (their homes do not meet one of three standards of adequacy, suitability or affordability) – 57.5% = 210 households (RDN – 55%, BC – 53%).
 - A significant number of owners also live in housing that is not adequate, suitable or affordable – 26% = 460 households (RDN – 20%, BC – 26%).
 - Over 150 people per week use the food bank operated by People for a Healthy Community.
 - The most vulnerable populations were identified as low-income seniors, young singles, families and older singles.
- In November 2019, a survey distributed by GHS was completed by 129 individuals, most with low to modest incomes, who expressed a need for affordable rental housing and interest in living at Paisley Place.

- Convenient location:
 - Paisley Place is within 500m walking distance of the Village Core; the OCP identifies sites within 2km as appropriate for Multi-dwelling Affordable Housing.
 - Most of the key services and amenities on Gabriola are located in the Village Core and surrounding areas.
 - The Paisley Place lots are close to the GERTIE bus route, not far from the ferry to Nanaimo, and within walking distance to the Health Centre and elementary school. The area is also well-supplied with walking trails as well as road connections.
- The proposed development is at 12 units per hectare, consistent with the direction provided in the OCP.
- The property has sufficient well water for the proposed development, and suitable soils for on-site waste disposal.
- The site is partially serviced with surfaced public road, stormwater ditches, wells, and driveway crossings.
- GHS was able to acquire the property through a donation, improving the financial viability of the proposed affordable rental housing project.
- Clustered housing development in 8 triplex buildings will minimize our neighbourhood footprint, allowing for more significant tree retention and forest conservation than a more widely dispersed development pattern.
- Clustered housing is a way to cost-effectively build affordable housing in a style that fits into Gabriola's rural character.
- A Public Meeting on November 16, 2019 was attended by approximately 95 people. We heard from a number of people there about how important this project is for local residents and workers, and many encouraged GHS to complete this project as soon as possible. We fielded a few questions and heard a few concerns. Please see the attached *GHS Response to Concerns Raised at Our Community Consultation: Held on November 16, 2019* for a summary of the Public Meeting and our responses to the questions posed by attendees.

Background

The GHS was formed in 2013 by members of the Gabriola community as a result of significant community discussion about the increasing challenge for Gabriolans to find and retain housing they could afford. At one time, affordable housing was mostly a challenge for those with quite low incomes. Increasingly, however, this challenge extends to Gabriolans with modest incomes as well. The data is definitive; the lack of affordable housing is getting worse in communities across BC and Canada. GHS efforts are one part of what needs to be a multi-faceted approach to meeting affordable housing needs on Gabriola .

With our knowledge of the needs for affordable rental housing on Gabriola, we established a broad framework for our first affordable housing project:

VISION: *Affordable, comfortable, secure rental housing for Gabriolans of all ages who have low to modest incomes.*

GUIDING PRINCIPLES:

- *Build healthy and efficient homes.*
- *Build homes near services and public transportation routes.*
- *Respect the natural settings and limits of the development sites.*
- *Provide affordable housing for a mix of Gabriolans to encourage a sense of community.*
- *Keep rents affordable with modest development and operational costs.*

A critical first step in the financial plan was the acquisition of Lots 1, 2 and 4 on Paisley Place via the generous donation from Emcon in August 2019. The project was also supported financially by private donations, the VanCity Community Partnership Program, and the Gabriola Auxiliary for Island Health Care Society; as well, the Gabriola Island Community Investment Co-op provided a start-up loan for initial work on the project. Currently, GHS is working with BC Housing to secure a pre-development no-interest loan.

However, the approximately \$7.5 million Paisley Place project will not be viable as envisioned without significant capital and operating contributions. We expect to secure substantial capital and operating funding via the BC Housing Community Housing Fund and the CMHC Co-Investment Fund. A prompt and successful rezoning and OCP amendment process not only will demonstrate local government commitment, but also will be an essential part of the GHS applications to BC Housing and CMHC later in 2020.

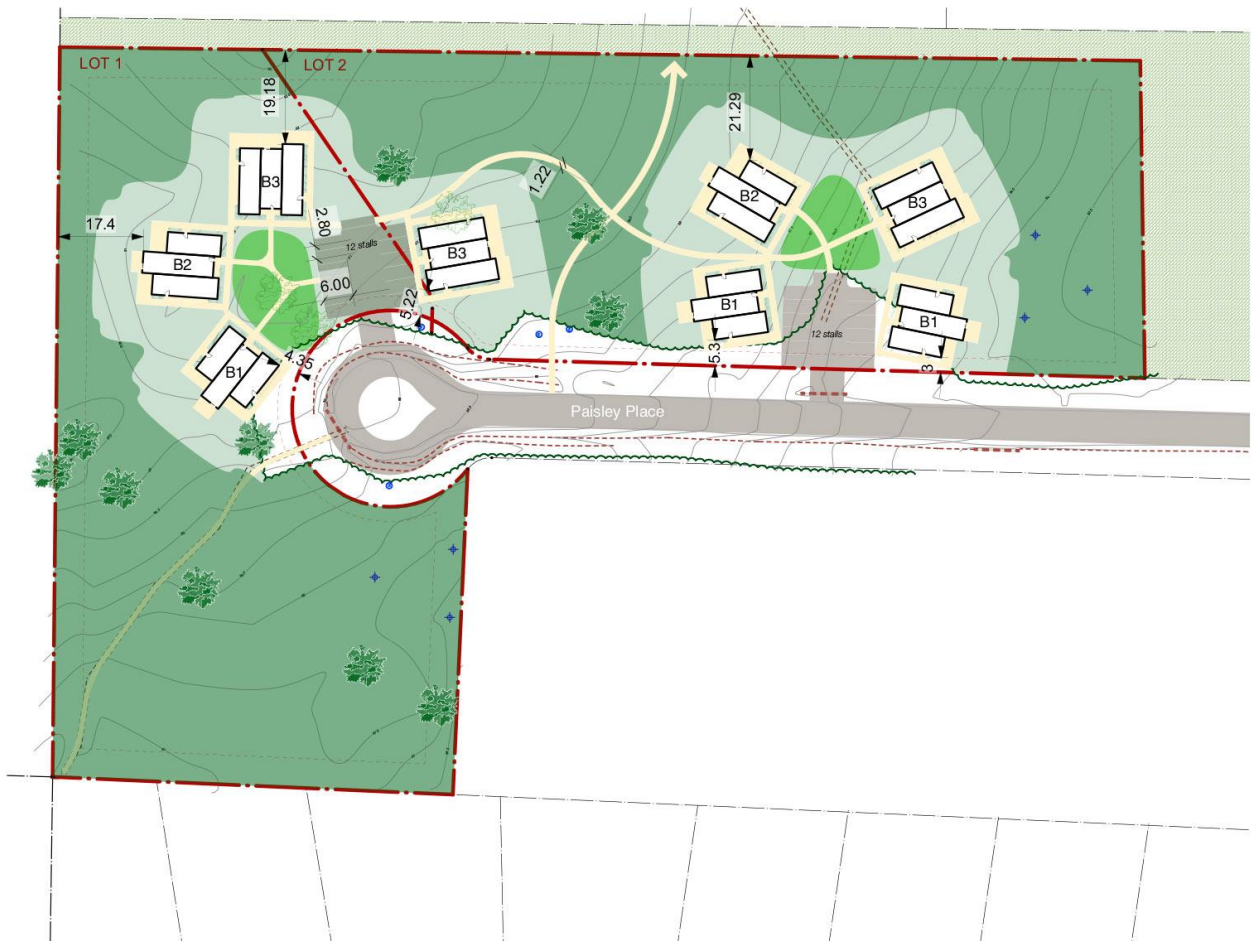
Project Proposal

The plans submitted with our application detail the project proposal. Key highlights include:

- 24 units in 8 buildings, in two groupings around shared parking and green spaces; this allows for significant retention of green space, with over 55% of the site retained as forest and another 12-15% of the site as shared and private open areas.
- A mix of one- and two-storey triplex buildings with a mix of studio (8), one bedroom (8), two bedroom (3) and three bedroom (5) units, including approximately 6 adaptable units; the lot coverage of the buildings will be approximately 6% of the 2 hectare Paisley Place Lots.
- The buildings are a significant distance away from the residences on Lockinvar Lane and Paisley Place, and the RDN trail bordering the school property to the east.
 - Preliminary site plan, unit designs, cluster designs and renderings are provided as part of this application.
- We will retain most of the existing neighbourhood trail connections that are currently used for access to and from the new park to the north, the school, the Health Centre and the Church Street neighbourhood; we will work with the Gabriola Land and Trails Trust and

Regional District of Nanaimo Parks department on final trail routing, design, and on-going maintenance.

- See the attached email from RDN about the impact of our proposal on the adjacent Paisley Place Community Park.
- Provision of 1 stall of vehicle parking per unit, bike parking for all residences, and visitor street parking along Paisley Place; we will work with the Gabriola Fire Department to make appropriate modifications to the road shoulder to allow for visitor street parking along Paisley Place while not compromising emergency access.
- All the units are modest-sized modular structures, and are consistent with the BC Housing Design Guidelines; this includes targeting Step 4 (very energy efficient) of the BC Energy Step Code, and reaching Step 3 at a minimum.



Capacity and Servicing

We have worked with appropriate professionals to confirm the capacity of Lots 1 and 2 on Paisley Place to support the proposed 24 units. These professional reports are included with our application and are summarised below:

Water

There are three wells on Lots 1 and 2, drilled by the previous owners. Elanco Enterprises Ltd supervised a multi-day pump test of well 104473 (“Well 73” on Lot 2) to determine its long-term sustainable yield. The well is drilled in bedrock and intersects a relatively large fracture. We know from the work of Elanco Enterprises that this well is connected hydrologically to the wells at the adjacent School and on the Emcon works yard, but not to the wells on Lockinvar Lane. The recharge zone for the well is estimated to be to the south and east. The report demonstrates Well 73 has a sustainable average daily yield of 0.18 L/s or 15.55 m³ a day. GHS will be submitting a Water License application to the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) for an average daily use of up to 0.18 L/s or 15.55 m³ a day by January 17, 2020. Once we have obtained a water licence, we will design a water treatment and distribution system, and obtain required approvals and permits under the regulatory authority of Island Health.

We do not expect, however, that the development will use as much 15.55 m³ a day, and have estimated daily average use to be between 11.5 m³ and 13.6 m³ per day. This is based on an estimated per capita water use between 221 and 232 litres per day and an occupancy of 52-59 individuals. This is sufficient water for 150 L per person per day for indoor water use, which is a reasonable assumption for residents in dwellings with Water Sense fixtures, possible small system losses, and 6 months of irrigation at 8500 L per day. Our water system will be metered to allow for reporting and monitoring of water use and an ability to make appropriate management decisions. Part of keeping to our water use budget will be to design any shared outdoor landscaping with native and mostly low water-use plants. We expect to include some shared or private food gardening opportunities and, through the detailed design process, will design gardens and irrigations systems to keep within our water budget. Our roof designs will also allow for rainwater harvesting, which we can implement for outdoor irrigation if so required and will prepare us for future water scarcity as a result of climate change.

See the enclosed report *Assessment of Well Yields on Proposed Housing Development Property, Paisley Place Gabriola Island, B.C.* for more information.

Wastewater

GHS contracted Save-on-Septic Services to evaluate the site’s soils for wastewater dispersal for the proposed 24 units. The excavated test pits and perc tests demonstrate that the site is suitable for the proposed use. We have room within the retained forest areas for dispersal and renovation of wastewater in combination with a Type 2 or Type 3 sewerage system. A Type 2 system requires a larger dispersal area than a Type 3 system. A Type 3 system has more involved treatment within the system itself, but requires more maintenance to ensure it

continues to work effectively. Where sufficient dispersal areas are available, Type 2 systems are often selected for their simplicity and more robust nature. The BC Sewerage System Regulation specifies the parameters of the wastewater dispersed by the Type 2 or Type 3 system.

We plan to install an at-grade dispersal system around existing trees rather than having to cut them down. The dispersal system will be covered with wood chips, which allows for the full depth of the existing soils and vegetation to be used for renovation of the dispersed wastewater. Microbes in the soil and in and around tree and plant roots remove pathogens and uptake nutrients. Over time the vegetation grows in around the dispersal system, further enhancing its effectiveness. We will continue to work with Save-on-Septic Services, Elanco Enterprises Ltd, and provincial regulators to select the most appropriate Type 2 or Type 3 treatment and dispersal technologies.

See the enclosed report *Feasibility Study and Assessment of site conditions on Lots 1&2, for suitability for development of a wastewater treatment and dispersal system – Paisley Place, Gabriola, B.C.* for more information.

Natural Environment

GHS engaged Ecora and their Senior Biologist to complete a baseline environmental report. The baseline report documents that the site has no environmental features that put any particular constraint on the proposed development.

The site, however, is within the Coastal Douglas Fir moist maritime (CDF mm), the smallest ecosystem type in BC; it is a threatened ecosystem type. The CDF mm encompasses all of Gabriola and the southern Gulf Islands, and portions of south-east Vancouver Island, the Sunshine Coast and the Lower Mainland. The Paisley Place site was mapped in 2008 as a sensitive mature ecosystem, reflective of the approximately 60-80 year-old forest on the site. Ecora identifies the site as having the zonal or “mesic” (neither too dry nor too wet) ecosystem variant, which is the most common variant within the ecosystem type and the least sensitive to development due to its average topography and soils. The site, therefore, is sensitive due to its relative rarity as an older forest within the CDF mm (compared to other lands more recently logged) rather than anything particularly unique about this site.

By clustering the proposed housing development, we will be able to retain approximately 55-60% of the site as contiguous forest and propose a 50% forest retention requirement be included within the new zone. The GHS does not have the resources available to actively manage the forest areas, but is happy to work with community groups or government agencies willing to take on this task.

See the enclosed report *Environmental Overview, Lot 1/2 SEC19 Gabriola Island* for more information.

Other Considerations

- **Fire Fighting:** We will provide an adequate water supply for fire suppression on-site as per the policy statement in the OCP. The specific quantity of water required will be determined through consultation with the Gabriola Fire Department and involvement of Code specialists at the detailed design and building permit stage.
- **Rainwater / stormwater:** The site includes two ditches along Paisley Place, but there are no outlets to Lockinvar Lane. Currently rainwater is directed onto GHS's private land where it is infiltrated into the forest. We will work with rainwater and landscape design specialist to determine the potential increase in rainwater from the buildings, parking, and other hard surface areas and design infiltration zones – taking advantage of existing natural areas (natural infrastructure) as much as possible.
- **Hydro:** Currently there is no power on-site; we will be installing new hydro poles to service the proposed development. Each cluster will have one pole roadside, with the service to each unit buried. In this way, the visual quality and rural feel of the site will be maintained as much as possible.
- **Solar power:** We plan to cost, design and build the units to be solar-ready so that we can explore creating a community solar project for the Paisley Place homes during construction or in the future.

Official Community Plan Amendments

The Gabriola Official Community Plan (OCP) supports the rezoning of sites on Gabriola to Multi-dwelling Affordable Housing, specifically stating: *"... provision is made for Multi-dwelling affordable Housing opportunities to meet the needs of a diverse, full-time population"* (OCP, Section 2.4).

At the same time, the OCP contains a number of parameters that would need amendments in order to enable our project to proceed. These include:

1. **Density Bank.** Currently, *"... unused residential densities are held by the Local Trust Committee for an unlimited time and for the purpose of enabling affordable multi-dwelling housing for low-income families"* (OCP, 2.5, Background).

Proposal: The Paisley Place site be designated to Multi-Family Affordable Housing without requiring the increased density to come from the Density Bank.

Rationale: The Density Bank was established in 2011; to date no densities have been contributed.

2. **Affordable Housing definition.** The OCP establishes the following definition of affordable housing (OCP, 2.4, Background): *"Affordable Housing" means housing that costs no more than 30% of a household's gross income applied to those households with incomes at or*

below 60% of the median household income for Gabriola Island (using Canada Census information).

Proposal: The Paisley Place site be designated Multi-Dwelling Affordable Housing based on providing affordable housing according to the terms of a Housing Agreement. We are willing to concurrently sign a Housing Agreement that commits GHS to a rent structure similar to that in Table 1 below, provided the Housing Agreement provides mechanisms to amend or deviate from the Housing Agreement should the terms of the financial commitment from BC Housing, CMHC or other major funder require a different rent structure than we currently anticipate.

Rationale: The 2018 BC Housing Community Housing Fund (CHF) criteria specified rents as needing to be 20% deep subsidy (people with very low incomes), 50% Rent-Geared-to-Income (people with low to modest incomes), and 30% affordable market rate (people with modest incomes). We anticipate that the next call for proposals from BC Housing, in March 2020, will follow a similar ratio. The affordable market units are included to enhance the mix of residents in one project – an approach that research has clearly indicated to be a much better way to design affordable housing, serve households with modest incomes, help cross-subsidize the lower rents, and create healthy communities. Even so, to make the approximately \$7.5 million Paisley Place project financially viable (remembering the land has been donated), we expect the funding formula to include about \$2.5 - \$3.5 million in capital grant/contributions and \$75,000 to \$150,000 per year in operating subsidies for 30+ years.

With this level of private and government support, we expect to deliver the following approximate rent structure (see Table 1).

Table 1. Paisley Place Preliminary Target Rent Structure

	Studio	1 bedroom	2 bedrooms	3 bedrooms
Deep Subsidy	\$375	\$375	\$570	\$630
Rent-Geared-to-Income (expected average)	\$550	\$639	\$765	\$971
Affordable “Market” Rents (preliminary estimate)	\$850	\$975	\$1,200	\$1,500

- 3. Occupant Restrictions.** Currently, *“for the purposes of this Plan Multi-dwelling Affordable Housing shall only be permitted for Special Needs residents living with physical and/or mental disabilities, Seniors 60 years of age or older, and low-income families”* (OCP, 2.4, Background).

Proposal: The Paisley Place site be designated Multi-dwelling Affordable Housing with no specific requirement for Special Needs, seniors, or low-income families. Instead, criteria for

affordability, residency and other issues such as age and special needs will be specified in the Housing Agreement.

Rationale: As indicated by the “Northern Region Housing Needs Assessment,” the need for affordable housing on Gabriola is broader than currently identified in the OCP. BC Housing and CMHC funding is not restricted to those particular populations. We do intend, however, to build a number of adaptable units to serve people with disabilities as needed

Rezoning

For Lots 1 and 2 on Paisley Place, we propose the creation of a new zone called Multi-Family Affordable Housing (MFAH). As illustrated in the attached project plans, we would propose the following modifications.

1. Permitted Principal Use: Multiple Family Dwellings
2. Maximum Building Lot Coverage: 10%
3. Lot Line Setbacks: 10 m, except 3m to Paisley Place. Paisley Place has a narrow road surface and wide 20m Right of Way. Buildings set 3 m back from Paisley Place allow for less disturbance of the site’s forest cover, while still retaining the rural character of Gabriola. The building faces that are immediately adjacent to Paisley Place will be 1 storey. Note, the concept plan includes larger setbacks than proposed in almost all cases. As we get into more detailed design and consideration of grading, tree retention and servicing, some changes to the siting may be required.
4. Minimum Required Forest Retention: 50% (trails, wastewater dispersal, and rainwater management permitted in Forest Retention zones).
5. Parking: We will apply for a variance to 1 stall per unit (from the required 1.25) with our Development Permit application, by which time we will be able to confirm the feasibility of street-based visitor parking and the provision of bicycle storage for tenants.

Request for Islands Trust Administrative Support

The Islands Trust, while equivalent to a municipal government in terms of responsibility for planning for the islands in the Trust Area, has a very limited budget and as a result is unable to provide a significant financial contribution to the development of affordable housing projects on islands in the Trust Area. Therefore GHS, as a charitable organization dedicated to the social wellbeing of the community, requests that the Gabriola Local Trust Committee and the Islands Trust Council demonstrate your *administrative* support for our proposal in the following ways:

1. Reimburse GHS for any rezoning application fees, related development application fees, and any related variance fees.

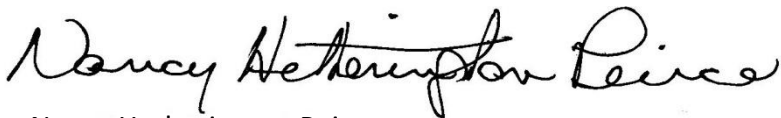
2. Waive any legal fees related to preparing bylaws, a Housing Agreement, or any other documents related to this application, and the related development application and variances.
3. To the extent possible, expedite the process of moving our application through the approval process.

Conclusion

GHS is committed to finding ways to provide affordable housing for Gabriolans with low to modest incomes. With your approval to rezone Lots 1 and 2 on Paisley Place, along with concurrent OCP amendments and a Housing Agreement to maintain this site as affordable rental housing in perpetuity, we expect to be successful in securing the funding we need from senior levels of government. Along with continued support from Gabriola Islanders, the support of this proposal by the Local Trust Committee and Islands Trust will be instrumental in GHS being able to help meet this critical community need.

We look forward to presenting our proposal to you and receiving your support.

Cordially,

A handwritten signature in black ink that reads "Nancy Hetherington Peirce". The signature is fluid and cursive, with the first name "Nancy" being the most prominent.

Nancy Hetherington Peirce
Board Chair, Gabriola Housing Society

Attachments