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**Subject:** FW: Rezoning Amendment Application No. RZ100778 (9153 Twinberry Drive) Rationale from the Applicant L&M Engineering and the Property Owner

**Attachments:** Land Use Rationale Letter March 30th, 2023 - L&M Engineering Ltd.pdf; RZ100778 PowerPoint Presentation from Property Owner James Wankel .pdf

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**From:** Ashley Thandi <athandi@lmengineering.bc.ca>

**Sent:** Thursday, March 30, 2023 3:46 PM

**To:** simon.yu@princegeorge.ca; Councillor Bennett, Tim <Tim.Bennett@princegeorge.ca>; Councillor Frizzell, Garth <Garth.Frizzell@princegeorge.ca>; Councillor Sampson, Kyle <Kyle.Sampson@princegeorge.ca>; Councillor Ramsay, Cori <Cori.Ramsay@princegeorge.ca>; Councillor Skakun, Brian <Brian.Skakun@princegeorge.ca>; Councillor Klassen, Trudy <Trudy.Klassen@princegeorge.ca>; Councillor Polillo, Ron <Ron.Polillo@princegeorge.ca>; Councillor Scott, Susan <Susan.Scott@princegeorge.ca>

**Cc:** Green Homes <sales@greenhomespg.com>; Jason Boyes <jboyes@lmengineering.bc.ca>; Kellett, Leslie <Leslie.Kellett@princegeorge.ca>; Broberg-Hull, Imogene <Imogene.Broberg-Hull@princegeorge.ca>; Wasnik, Deanna <Deanna.Wasnik@princegeorge.ca>; Holahan, Kali <Kali.Holahan@princegeorge.ca>

**Subject:** Rezoning Amendment Application No. RZ100778 (9153 Twinberry Drive) Rationale from the Applicant L&M Engineering and the Property Owner

Good Afternoon Mayor Yu and Members of Council,

By way of an introduction for those members of Council who I have not had a chance to meet yet, my name is Ashley Thandi and I am the Community Planner with L&M Engineering that is representing Rezoning Amendment Application No. RZ100778 (9153 Twinberry Drive) on behalf of my client Mr. James Wankel. We wanted to reach out and thank you for taking the time to consider our application for 1<sup>st</sup> and 2<sup>nd</sup> Reading on Monday March 27<sup>th</sup>, 2023. From a land use perspective, we were a bit surprised at the outcome of the vote for the application to proceed to 3<sup>rd</sup> Reading and we would like to take the opportunity to directly provide Council with our updated land use rationale letter for why from a community planning perspective this proposed land use is the highest and best use of a portion of the subject property. Our client, Mr. Wankel has also provided a brief PowerPoint outlining the development vision rationale for the proposed land use for Council consideration. Both the letter from L&M and the PowerPoint from Mr. Wankel also separately address some of the concerns outlined in the neighbourhood correspondence that was received through Administration's public consultation process prior to the application proceeding to Council for 1<sup>st</sup> and 2<sup>nd</sup> Reading. We have cc'd the City's Legislative Services Division and the City's Planning and Development Division onto this email in order to ensure that both the updated land use rationale letter and PowerPoint presentation are posted on the agenda for the public to view when the application proceeds forward to 3<sup>rd</sup> Reading.

If it is appropriate, we are happy to answer any questions or address any concerns that Council may have regarding the proposed land use amendments prior to 3<sup>rd</sup> Reading either via email, over the phone or through an in-person meeting at a date and time of your convenience. Thank you again for your consideration of our proposed land use amendment and we look forward to viewing Council's discussions during 3<sup>rd</sup> Reading. Have a great day!

Yours Truly,

*Ashley*

Ashley Thandi, BPI  
Planner

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Dear Mayor Yu and Members of Council,

On behalf of Westcan Property Ltd., we would like to thank you for the opportunity to submit this planning rationale letter for Council consideration. We would also like to thank Administration for their support and assistance throughout the preliminary stages of this application process. This rezoning application proposes to rezone 11.5 hectares of the subject property from RS2: Single Residential, RM1: Multiple Residential, RM3: Multiple Residential and AG: Greenbelt to RM9: Manufactured Home Park and AG: Greenbelt. The proposed RM9 zone permits manufactured housing to the CSA A277 factory built standard (modular home on a foundation) as well as housing built to the CSA Z240 standard (mobile home on a steel chassis). In the case of the subject property, modular homes will be built to the CSA A277 standard which are held to the same BC Building Code standard as a single family home. The current Official Community Plan Future Land Use Designation for the portion of the subject property that is proposed to be rezoned is Neighbourhood Residential which is entirely consistent with the RM9 zone and as such, the proposed zoning amendment will not require an amendment to the City's Official Community Plan.

We understand and hear the frustration of some local residents regarding the perceived socio-economic status of the future residents of the modular home park and the implications of certain characteristics that this might bring to the area. From a land use perspective, we want to ensure that land use applications look to the legitimate land-use planning considerations (such as building type, height, setbacks, overall form and character, etc.) and they do not consider the assumptions about the people who will live in the housing permitted under the proposed zone. Our goal is to continue to ensure that Prince George remains an inclusive community that provides housing opportunities for all and in this case, the housing will be directed towards retirees, families and first-time home buyers.

Modular homes built to the CSA A277 standard can take many forms such as one or two-storey style homes that can currently be found on rural properties, urban lots or on suburban streets. As such, modular home parks play a very important role in facilitating housing affordability within the City as they aid in increasing housing diversity and housing choice. A diverse housing choice can present residents with an opportunity to age in place, potentially increase the supply of rental market housing in the City and facilitate more affordable homeownership. This is all consistent with Official Community Plan policy 7.4.14 which encourages neighbourhoods to have a diverse housing stock that provides a range of affordable options for households of different incomes and at different life stages. The housing need in our City has changed over the last decade and we now understand that the predominately larger single family lot subdivisions that are typical in the Hart area provide a very limited selection of housing alternatives. The proposed land use amendment on the subject property seeks to lessen this gap in housing choice and availability by providing a housing form for the neighbourhood that would be complementary to the surrounding single-family lots and would not disrupt the overall built form of the area. This is because if the Rezoning Application is approved by Council, the subject property will be required to go through an extensive Form and Character Development permit process prior to the issuance of a Building Permit. The City will have to approve the overall manufactured home park layout which would include a landscape plan for internal landscaping and perimeter buffering, identification of parking areas, snow storage areas, an internal road layout and pedestrian connectivity between the manufactured home park spaces. This is all done to ensure that modular home park developments are built to a high standard and in accordance with City Bylaws for form and character.

We also understand there have been some neighbourhood concerns regarding the proposed future land use of the parcel in relation to an existing Statutory Building Scheme that is registered on the parcels of homes located on Twinberry Drive. This Statutory Building Scheme restricts mobile homes (CSA Z240) to be placed on lots located on Twinberry Drive however it does not restrict the placement of modular homes (CSA A277). Notwithstanding, we want to make Council and residents aware that this Statutory Building Scheme is only registered for those parcels on

Twinberry Drive and on the few homes built on Meadow Rim Way, it is not registered on any lands under consideration of this Rezoning Application. As such, although the homes proposed within the new development will be modular and not mobile, the proposed land use and future housing forms are not restricted on the lands through a statutory building scheme.

We are currently working with the City's Transportation Division and the Ministry of Transportation and Infrastructure to conduct a Traffic Impact Analysis for the proposed development, which is a requirement of Final Reading for this application. The Traffic Impact Analysis will consider trip generation and any impacts that the development traffic may have on the surrounding road network including Highway 97. We are also in the process of working with the City's Infrastructure Division to develop a Servicing Brief for the development which is also a requirement of Final Reading for this application. The Servicing Brief will consist of a technical analysis to determine if the development can be serviced via existing water, sewer and storm water infrastructure.

We are confident that the proposed modular home park on a portion of the subject property will provide a moderate infill project that will not negatively impact the neighbourhood. The development is entirely supported by the Official Community Plan's Future Land Use Designation and if approved, it will be required to go through the City's Form and Character Development Permit process. While historically, the residential lots in the Hart have been larger and consist of single family homes, there is an expressed need for more housing variety, for more residents to age in place and to create a more diverse market housing stock that provides an affordable option for first time homeowners. We encourage Mayor Yu and Council to please thoughtfully look at the proposed land use amendment in relation to the legitimate land use considerations that have been shown before you through Administration's Staff Report to Council and our land use rationale letter. As well as to consider the future of the housing need in our City and how we can work to ensure that new and existing subdivisions are inclusive of a variety of housing forms that create compact and complete neighbourhoods while respecting the existing built form and public realm.

We would like to thank Mayor Yu and members of Council again for the opportunity to submit this letter and for your thoughtful consideration of the proposed land use amendment. We would also like to thank the surrounding residents for expressing their questions and concerns during the City's public consultation process. Should Council approve of the proposed land use amendment, we look forward to working closely with Administration during the future Development Permit process to ensure that this is a mutually beneficial project for the neighbourhood, the City of Prince George and Westcan Property Ltd.

Sincerely,

**L&M ENGINEERING LIMITED**

A handwritten signature in black ink, appearing to read 'Ashli', with a horizontal line extending from the left side of the signature.

Ashley Thandi, BPI  
Community Planner

# Letter Mayor and Council

Rezoning Amendment Application No. RZ100778  
By Westcan Property Ltd and Green Homes March 30<sup>th</sup> 2023

Dear Mayor Yu and Members of Council,

My name is James Wankel and I am the owner of Westcan Property Ltd and Green Homes. I wanted to take the opportunity to thank you all for your consideration of the rezoning application for 9153 Twinberry Drive that went before Council for 1<sup>st</sup> and 2<sup>nd</sup> Reading on March 27<sup>th</sup>, 2023. While I was disappointed and a bit surprised at some of the comments stated around the Council table regarding modular home parks, I appreciate your time and efforts for my application. I'd also like to take this opportunity to address some comments received by the surrounding residents and hopefully clear up some misconceptions that may be had regarding modular home parks.

My company Green Homes provides green housing that is 30% more energy efficient than the current average stick builds in the City. Our homes are built to the CSA A277 home spec modular standard and are built to the same BC Building Code standards as the stick built homes you currently see in single family neighbourhoods. Due to this, we are not selling trailers, commonly known as mobile homes, so our preference when speaking about our developments is to address them as modular home parks, modular home communities or land leased modular home communities. My company prides itself of providing affordable new market housing options for members of our community that are having a hard time getting into the housing market. We are trying to provide an entry for people trying to get ahead and an opportunity for people to gain some equity. Our homes can be found in single family subdivisions around the City or in modular home parks.

After doing a market analysis, an in depth review of the City's Housing Needs Assessment and taking into consideration the rate of inflation over the last number of years, I realized that if we developed the entire property as title or strata lots the housing price would become not affordable. Rental land in a modular community is an affordable option while still ensuring that the overall form and character of the parcel remains consistent with the existing subdivision as we are building the CSA A277 standard. This is not high density multi-family housing. It's important for me to note that only a portion of the parcel is being proposed to be zoned for a modular home park, there is still a significant amount of land that will remain zoned as RS2: Single Residential.

I want to ensure that the future modular home development is well planned and thoughtfully designed as it will affect the overall aesthetic value of the development and the overall quality of life not only for the residents of the modular community but for the surrounding residents as well. For this reason, I share a lot of the same goals as the neighbourhood with respect to appearance and quality of the development. We would begin this project as a blank slate. Our vision and want is to have decks, driveways finished, sod and landscaping, space for a park and a nature trail around meadow lake that can be accessed by the whole community. All of this will be considered and will be required to be approved by Administration through the Form and Character Development Permit process if this application is approved by Council.

Respectfully, I do not believe it is fair to indicate at the Council table that "trailer parks" should not be placed closely to a nice single family subdivision as was stated by Mayor Yu on March 27<sup>th</sup>, 2023. While I believe this was not the intention, this type of comment is rhetorical and sets up a negative stereotype of modular home parks that is not fair to those members of our community currently residing in modular homes and in modular home communities. My target demographic for this development is retirees, families and first time home buyers. In the next few slides I'd like to provide a quick overview of my vision for the project in an effort to show that this type of development does in fact belong to be integrated into existing residential neighbourhoods to ensure that everyone of all different backgrounds and demographics have an opportunity to live in complete neighbourhoods.



**GREEN HOMES**  
QUALITY BUILT FACTORY HOMES

*Meadow Park has  
your dream home!*

# Here's Why...



## Affordable

Whether this is your first home or you're buying to retire, this project has something for everyone.



## Location

Meadow Park is centrally located 5 minutes North of the Hart Mall area in Prince George.



## Growing Area

The Hart Highway is one of the most desirable areas to live in Prince George.



## Clean Air

Breathe in the fresh and crisp mountain air every morning and enjoy the many benefits of the lush green forests.



## Investment

Due to the overwhelming desire of Prince George lot prices are rising all over the city.



## Value

Compare your options and you will see that Meadow Park is the best value in the city.

1520 Sq ft

3 Bed

2 Bath



Plan 4

1520 Sq ft

3 Bed

2 Bath



Plan 10

Plan 13



1520 Sq ft

3 Bed

2 Bath



Plan 5



1280 Sq ft

2 Bed

2 Bath



Plan 11



1520 Sq ft

3 Bed

2 Bath



1520 Sq ft

3 Bed

2 Bath



Plan 12



Plans, Pricing and Designs are for illustrative purposes and are not to scale. Pricing and plans are subject to change.

Platinum Specs-CSA, A-277



# Addressing Concerns

As you can see from the above slides, our goal is to provide a high quality modular home park for various modular home styles that will suit the needs of anyone in our community. I'd now like to briefly address some of the concerns brought forward by residents in an effort to provide a bit more information for Council to make an informed decision on the land use.

## **Concern #1: North Park Heights (existing modular home park along Highway 97)**

While this is outside of the land use discussions that are required to be had at the Council table, I feel it is important for me to address this as it was not only mentioned during Council but also in the residents correspondence. In 2017 I purchased Burls Manufactured Home Park, now called North Park Heights, that is located along Highway 97. The first portion of this park consisted of 35 units that were developed before the Hart amalgamated with the City so this part of the park was grandfathered in. At the time that I acquired it, it was not well taken care of and had trouble renters and tenants. The back portion of the park was relatively vacant so in 2019, with Council's support, I rezoned this back portion to RM9 to expand the existing modular community. Through this expansion I was able to add 15 new lots all with new modular homes and infrastructure upgrades to the entire park which included power upgrades, a new storm service, a new paved internal road and new fire protection/hydrants which were not in place when I bought the property in 2017. As tenants moved out of the park I was also able to remove derelict homes and replace them with new modular homes. In total I added 36 new modular homes to the community. As my company prides itself on providing affordable housing, I had and still have no interest in "renovicting" existing tenants that are in the first portion of the park in order to add new modular homes to make that portion more desirable. The extent of the revitalization for this park was the expansion only because I wanted to ensure that residents that had been in the park for a number of years could remain in their existing homes and continue to have an affordable housing option. I've asked the existing tenants to continue to do their best to clean up their lots with the understanding that there are a few units that are not in the best shape but these people need a home. We have strict rules and regulations in this community that we intend to impose on all future modular home communities we develop. Due to this, I don't believe it is fair for Council to consider this development when deciding on my proposed land use amendment on Twinberry Drive. As mentioned in the previous slide, on Twinberry we are starting with a blank state not revitalizing a portion of an existing modular home park.

## **Concern #2: Low Income Population, Increase Crime and Undesirable Behaviours**

Again while I believe the socio-economic status of the people living in modular home parks is not a land use consideration I was very surprised at the comments received by the residents. In my North Park Heights modular community every single lot is owned and not rented and consists of first time home buyers that are families, business owners, retired couples, single parents, first responders and working couples. To have numerous residents have a perceived notion that a modular home means low income and an increase in crime is unfair and unjust. Mayor and Council I urge you to please respect your Planning Department, your Official Community Plan and strategic priorities when considering this development and not to look into the stereotypes and misinformation of people that live in modular home parks.

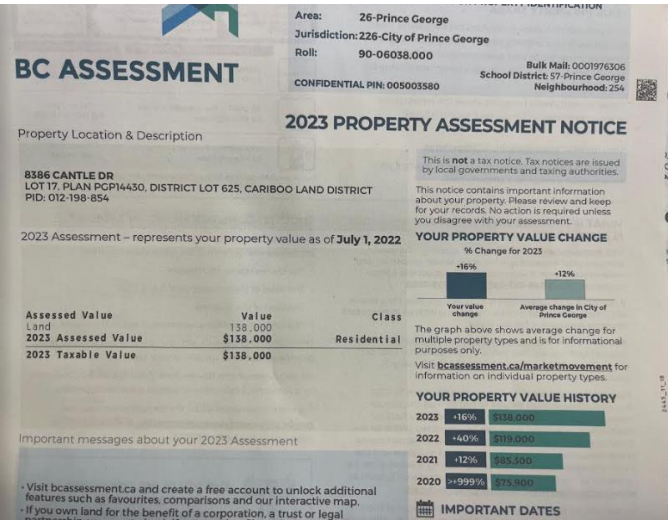
# Addressing Concerns

## Concern #3: Density

The current area that is zoned RS2: Single Residential that is directly surrounding Twinberry Drive is approximately 13 ha in size and under the current OCP designation if developed at 22 dwellings/ha we could get 286 single family lots developed without Council approval. Under the current land use proposal we are proposing to rezone an 11 ha portion from RS2 to RM9 and 0.44 ha to AG: Greenbelt. A direct calculation would allow us to develop 242 modular home lots however, because we have to go through a Form and Character Development Permit process the 242 modular home lots max density does not take into consideration the required open space and landscaping, the required 6.0 m perimeter buffer around the modular home community as per the City’s Zoning Bylaw, the internal road layout, pedestrian connectivity and snow storage areas. This significantly reduces the developable area of the project which in turn will allow less modular home lots and still less density than what would be developed if the site was a single family subdivision. I understand the concerns of residents due to density but the above density rationale indicates that the density of the modular home community would be significantly less than if there were a single family subdivision.

## Concern #4: Decrease in Property Values

I understand the fear of residents that a modular home community or modular homes will decrease their property values and I understand residents wanting to protect their investments into their homes. However, it’s important to note that assessments conducted on the value of properties take into consideration a multitude of variables and it is unlikely that the presence of a different housing form in the area will have an adverse impact on the value of surrounding properties. As an example, Green Homes has placed a number of modular homes in the Western Acres single family subdivision and surrounding homes have not seen a decrease in property values. In fact, the property values have remained consistent with the rest of the city, values have gone up as the tax base increases due to new homes going up.



# Summary

Since the outset of this application and the very first meeting with the City Planning Department, we were met with support for the development and land use amendment. The support stemmed not only from the clear policy support found throughout the Official Community Plan, but also from the agreed-upon notion that complete neighbourhoods contain a healthy mix of housing forms that appeal to a wider range of the population's needs. There is a team of community planners and professional engineers that have helped me to provide land use rationale as to why a modular home community is the highest and best use of this land and I hope that this development vision rationale has helped to supplement the land use rationale for Council consideration. Thank you for the role you play in our community and for your consideration of our rezoning amendment application.