

## Penticton Multi-Residential Development

GGA File: 23050/1.2A

Site Address: 251 Comox St (west site), and 998-997 Westminster Ave W (east site)

February 09, 2026

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## Re: Development Permit, TPC Response 2 - Letter of Intent

To whom it may concern,

The proposed development is a 6-storey, wood-frame construction, residential apartment building with 147 units. It has been certified by the Rick Hansen Foundation for accessibility and achieves Step 3 of the BC Energy Step Code. It's located in an area that contains predominantly commercial developments and single-family residential homes, with only a handful of low-to-medium density residential developments. With consideration of the North Gateway Plan, the development will provide more density to the area, as well as diverse housing types that range from studios to 3-bedroom units.

Since the building is prominently situated at the corner of Burnaby Avenue and Comox Street, we recognize the importance of the public interface. The development incorporates characteristics of a "front porch" typically seen with lower-density housing to help bring the scale of the building down at the street level and promote pedestrian activity. These features include walkways into each ground-level unit; planting to act as a buffer between the public and private spaces; and ground-level patios, entry doors, and porch lights for wayfinding and general illumination. The upper-level units will also add to the overall activity of the area and provide more eyes on the street to promote public safety.

Currently, there are no formal sidewalks along Comox Street or Burnaby Avenue adjacent to the proposed west site. In an effort to facilitate existing pedestrian connectivity, as well as future connections, we are proposing to construct new sidewalks along both roads at the west site. See below for our variance request for the east site.

The parking area is split between the 2 proposed sites, with 72 stalls on the west site and 65 stalls on the east site. With the development being constrained by the size of the lots available it is necessary for the parking to be split between the sites. The bylaw notes a lot located at 232 Wade Avenue W that has an approved use of parking. Additionally, clause 6.1.4 of the bylaw notes that parking on a separate lot is permitted in some cases. While we understand this is typically seen in city centre areas that are zoned C5 or C6, we hope this will be strongly considered for the proposed development.

As discussed with the City of Penticton Planning Department, we are revising this application to have both sites (east and west) be considered 1 development under 1 application. We are proposing both sites to be rezoned from C7 to RM3.

As part of the Development Permit application, we are seeking a land-use redesignation from C7 zoning to RM3. And due to constraints of the lots available and the proforma requirements to make the project financially feasible, we are requesting variances to the zoning bylaw, which are outlined below.

1. The proposed FAR is 1.69, whereas the allowable FAR is 1.60. The increased density is not only needed for the viability of the project but is also in line with the intent of the North Gateway Plan for increasing density. The bylaw also notes a lot located at 914 Churchill Avenue that has an approved FAR of 1.98.
2. The total number of parking stalls provided is 135 (both sites combined), whereas the total number required is 176. In conjunction with the density needed for the development and the size constraint of the lots, we have made every effort to balance parking count with landscape areas. And as per OCP policy 5.1.3, Parking Variance item 2, there are several transit bus stops

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within approximately 400m from the development that connect to multiple bus routes, along with secured class 1 bicycle parking provided within the building, which we believe will reduce the need for parking and encourage the use of public transit. With that being said, we propose dedicating 8 stalls as visitor parking near the building entrances. Feedback from Wexford's existing projects in other BC cities have indicated that those developments have parking that is under-utilized, and that a ratio of around 0.6 stalls per dwelling unit was sufficient. Lastly, the development meets the number of required accessible parking stalls.

3. The total amenity provided on the west site is 2,687.5 sm, whereas the minimum required is 2,940 sm. The hard surface area needed for the parking lot and building footprint has limited what is available to be used as outdoor amenity space. With that being said, each unit is being provided with ample private patio/balcony space, and the building also offers a ground-level gym and sixth-floor shared amenity and patio space that looks out towards the lake and valley. Also, within a 10-15 min. walking distance the development is in proximity to a number of public amenities, such as the Riverside Basketball Court and Marsh, and Penticton Skate Park to the west; Okanagan Lake Beach to the north; and Peach Baseball Park, South Okanagan Events Centre, and Penticton Community Centre to the east.
4. The percentage of hard surface area on the west lot is 83.8%, and on the east site it is 73.3%, whereas the maximum allowed is 60%. This is due to the size of the lot and the area needed for the proposed parking and development. And in coordination with the Civil Engineer involved in the project, we are confident that the proposed development will adequately address stormwater and site servicing concerns. Additionally, with the design considerations of the ground-level units and patios, along with the landscape buffer and plantings, we feel that this creates an aesthetically pleasing and desirable development.
5. Regarding the front entry wood feature, this has been revised to only project 600mm into the setback as per bylaw 4.9.1 regarding architectural projections. If this change does not meet the intent of the bylaw, we are seeking a minor variance as per OCP policy 5.1.3, Setbacks Variance item 1. b), which pertains to architectural features. The building face meets the required bylaw setback and the feature has been designed to highlight the main entry of the building, which will facilitate wayfinding, and with the wood-look material it will bring an element of warmth to the street elevation.
6. With the east site proposed to be rezoned to RM3, we are seeking a change of use to allow a standalone parking lot on this site.
7. We are requesting a variance for the EV-ready requirement so that there is no EV-ready infrastructure on the east site. To allow for project feasibility, EV infrastructure has been prioritized to the west site only. The west site is meeting bylaw standards and will have 64 EV-ready stalls to service the building. All tenants with an electric vehicle will be given priority to park and charge their vehicles on this site. As a rental building there will be a dedicated property manager to manage demand for EV stalls instead of having a dedicated stall for purchase in a for-sale condo, which allows for more flexibility for use of the proposed EV-ready stalls on the west lot. We will commit to having 5 EV chargers installed on the west site (servicing 10 stalls total) for tenant use upon occupancy and will manage demand accordingly through the property manager. Existing projects within the developer's portfolio support having charging on demand for tenants to minimize up-front costs and allow for maximum tenant usage.
8. The project is requesting a variance for the frontage improvements on the east site. The west site will have full curb, gutter, and sidewalk improvements to enhance the public realm, including an extension all the way to Westminster. The east site is proposed to have curb and gutter along Comox St and Burnaby Ave but no public sidewalk fronting those streets. However, a walkway will be constructed on the southwest corner to connect the parking lot to the existing sidewalk in order to provide an accessible path to the building. To maintain overall project feasibility, it is proposed to defer sidewalk improvements on the east site, directing investment to the primary development while avoiding premature infrastructure that may need to be removed or reconfigured as part of future redevelopment.



Please note that we are having the General Contractor and Landscape Architect review the Landscape cost estimate for the required security, and this will be submitted shortly.

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Sincerely,

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