

## ADDITIONAL RATIONAL (3) FOR SUBDIVISION: 8005 PRINCETON SUMMERLAND RD

July 6 2023  
Drafted by John Rousseau

Upon reading the most recent administrative report drafted by Shannon Duong and endorsed by Chris Garrish, it has become clear to me that no one in the planning department has carefully read any of my previously submitted documents. This is due in no small part to the massive labour shortage they are facing as a department. If planning had the resources to carefully read my previous submitted rational documents and other professionally drafted reports, there would have been no need to state the following in their most recent report:

*“Administration finds that the applicant has not clearly demonstrated the **need** for the proposed subdivision, nor that the proposal is in alignment with the objectives of the OCP Bylaw. Furthermore, it is not clear how the proposal satisfies the evaluation criteria under Section 10.3.4(b) of the Area F OCP.”*

I find it difficult to understand how anyone currently holding a planning position in this country could question the need for additional housing or developmental land. We have personally gone to great length and expense in order to prove the viability and sensibility of our own small development, while in the middle of a major national housing shortage, and planning is asking us to singlehandedly prove the **need** for more subdivision? Do they watch the news? The need for housing seems a little self evident at this time....

However, as a result of reading this completely tone deaf statement, I felt obliged to compile all of the previously submitted information as well as some additional perspectives gained from this process in an easy to read format which adheres to the RDOS- Regional Growth Strategy Bylaw and the area F OCP.

The clarification is as follows:

Specifically speaking to Section 10.3.4(b) of the Area F OCP Bylaw:

Requires any proposal to create additional land designated or zoned either Large Holdings or Small Holdings to:

- a) Clearly demonstrate and articulate the need for it in the context of its impact on the community and the objectives of this OCP; and

I would like to lead off by quoting the Minister of Housing, Ravi Kahlon,

“We are in urgent need of more housing throughout British Columbia, which is why we are taking strong steps through our Homes for People strategy to close the gap between supply and demand. We are working with our partners to unlock more homes across the spectrum of housing faster than ever, so everyone in our province can have a safe, secure and stable place to call home.”

We are in the middle of the largest housing crisis in provincial history. This, coupled with the fact that we are facing a massive skilled labour shortage has created a perfect storm for ever increasing house prices in rural areas such as where we live. As the Minister of Housing has stated, “We are in urgent need of more housing throughout the Province”. The production of new housing invites high paying, specialized trades to reside in our communities. It is our opinion that if we do not offer an improved volume of this type work, it will further exacerbate the affordability crisis as dictated by basic supply and demand principals. We share the opinion of the housing minister that unless we do something to improve housing availability, we will lose what young, skilled trades people we have to other markets that they can afford to live and work in.

Our development will have a positive impact on the area by creating high paying jobs for all of the associated trades and due to the nature of our development, will have a favourably low impact on the surrounding area all the while improving the housing we need to see in our community. We have not received a single negative representations from any of our neighbours regarding this application and as we are residents next door to the proposed development, we are very tastefully designing this project to have a near zero impact on the pristine terrain.

We based our development on section 1C-4 of the Regional Growth Strategy bylaw which states:

Limit consideration for rezoning of large rural land parcels to smaller parcel sizes outside of Primary Growth Areas and Rural Growth Areas only where such growth is infill, does not significantly increase the number of units or the established density, and respects the character of its surroundings.

This policy perfectly personifies our intentions and this development as a whole.

The Parcel does not currently meet the minimum parcel size for RA zoning (20HA)

We feel that this is yet another reason why it is a natural candidate for rezoning.

As part of this RA zoning, we are currently able to have 1 primary residence and 2 secondary residence on the parcel, a density similar to what we are proposing through rezoning and subdivision. We are

currently able to drill as many wells as needed to suffice domestic ground water demand on the parcel without the need for a water licence or any intergovernmental oversight.

Insofar as adhering to The Area F OCP, it clearly states in section 5.1 (Visions):

'Electoral Area "F" is a predominantly rural area made up of two principal settlement areas - the more residential Greater West Bench area, and the more rural, agricultural area of Faulder/Meadow Valley. Both areas value their rural and semi-rural characters, **but will consider limited growth subject to it maintaining the character of the areas**.'

The OCP also clearly states in section 5.2.1 of (Broad Goals):

'Residential development and housing: Provide the opportunity for limited new growth and housing options for all age groups, while ensuring new housing development maintains the area's rural residential and agricultural character'.

Our proposed development strictly aligns with the parameters of the RGS and the Area F OCP and we are hopeful that upon further consideration you will see this to be the case.

b) Provide an assessment of the proposal against the following criteria:

i) availability of vacant land currently designated as either Large Holdings or Small Holdings;

There are currently no Large or Small holdings parcels for sale or development in Area F.

ii) capability of the natural environment to support the proposed development;

We have engaged 3 local professionals to objectively evaluate our proposed development:  
All of their reports can be viewed in full on our RDOS application portal:

<https://www.rdos.bc.ca/development-services/planning/current-applications-decisions/electoral-area-f/f2022-006-zone>

Our Qualified professionals are:

Lisa Scott (M.Sc., R.P.Bio.) from Eco Matters Consulting,

Jon Fennell Hydrogeologist , (M.Sc., Ph.D., P.Geo.)

Rick Evans, (ROWP)

All of them came back with identical findings regarding groundwater consumption, waste water treatment and environmental impact: low to no impact on the surrounding area/environment. We understand that planning does not have time, due to the current labour shortages, to read any of these reports before writing their administrative report, but we encourage you to dive into the material to verify the findings of the professionals that we have retained at our great expense.

iii) impact on environmentally sensitive areas, as illustrated on Schedule 'I' (Environmentally Sensitive Development Permit Areas);

Lisa Scott of Eco matters consulting was engaged to review our proposal. She conducted a full environmental assessment and concluded the following:

**“retain all wildlife trees/decaying wood debris and reseed disturbed areas after development is complete”.**

Other than that, our development poses no threat to the area or surrounding environment.

iv) capability of accommodating on-site domestic water and sewage disposal, or availability of community water or sewer, and submission of an assessment from a qualified professional in accordance with the Regional District Subdivision Servicing Bylaw;

We have retained Hydrogeologist Jon Fennell, (M.Sc., Ph.D., P.Geo.) who is one of Western Canada's foremost authorities on ground water to peer review the findings of the most recent Meadow valley acquirer study and speak to the effect, if any, our subdivision/ rezoning will have on the environment at large and the Trout Creek aquifer. His report Concluded the following:

**“The results of this assessment show that drawdown effects from the operation of these bedrock wells will be minimal to negligible at the rates they will likely be pumping. As such, the risk of impacts to other water wells in the area, water supplies in the MVA, and local surface water features (i.e. Trout and Darke creeks) is similarly minimal to negligible.”**

We also engaged Rick Evans, Registered Onsite Wastewater Practitioner (ROWP), to survey and design all of the waste water scenarios for the proposed lots. There were no challenges discovered due to quality of ground conditions and the amount of available land for this purpose.

-There is no community sewer in the area.

-We petitioned the RDOS board to include the parcel into the Faulder Community Water system in 2021, the board denied the application.

v) proximity to existing roads and other community and essential services;

The Parcel is located directly adjacent to HWY 40 (Summerland Princeton rd)  
The parcel also borders the Faulder Community Water System.

**vi) susceptibility to natural hazards including but not limited to flooding, slope instability or wildfire risk;**

According to the supplied RDOS mapping the following has been concluded about the subject parcel:

-The subject parcel is not located in a wildfire risk area.

-The subject parcel is not located in a Geotechnical sensitive area.

-The subject parcel is not located in a Floodplain area.

-The subject parcel has both 30% and +30% steep slope features in select locations.

-The subject parcel is located in an Environmentally sensitive area.

-The subject parcel is located in a Watercourse Development permit area on the RDOS website mapping but this Polygon has been concluded to be incorrect by Lisa Scott of Eco Matters Consulting. The Parcel should not be located in a WDP area.

**vii) compatibility with adjacent land uses and designations, and the character of the existing area;**

Due to the fact that the parcel is flanked on 4 of its 6 facets by SH3/4 we feel that it is a natural candidate for this type of rezoning. We feel that the impact of light residential development on this parcel versus any commercial or industrial activity that its current RA zoning permits is a far better fit for the rural character of the neighbourhood. As previously mentioned, we have not received any negative representations from any local stakeholders or landowners.

**viii) consideration of visual impacts where development is proposed on hillsides and other visually sensitive areas; and**

The proposed development is located in a dense conifer forest with limited views of trout creek canyon. All houses will be nestled amongst old growth pine and fir trees and will be sited similarly to the pre existing of residences in the area. This is a small, integrated residential development, not a massive sprawling clear cut which characterizes what we have seen previously approved in Naramata....

ix) type, timing and staging of the development

We are currently building a single family dwelling on the parcel but would like to begin construction of other residential buildings in order to accommodate the demand in the market.

We hope that this clarifies any questions or concerns you may have regarding this development. If you put your stamp on this, we go to work to make the community better offering high paying jobs to trades workers and doing our part to improve the housing supply. If you don't stamp this, we go bankrupt as a family. Which would you prefer?  
Thank you for your consideration.

John Rousseau