

March 9, 2023

Lake Errock Gravel Pit Redevelopment – FVRD Electoral Area Planning Preliminary Referral

With the Region expected to add approximately 160,000 more people by 2050, there will be growth pressures in the rural electoral areas and it will be important to consider what growth is appropriate in these areas. Some of these growth pressures are already occurring, with interest from developers in building large projects not often seen in the electoral areas, including the Lake Errock Gravel Pit redevelopment.

These are general comments from the FVRD Strategic Planning and Initiatives department made in context of the FVRD “Choices for our Future” Regional Growth Strategy by-law No. 0569, 2003 (referred to as the 2004 RGS) and the draft FVRD Regional Growth Strategy (referred to as the Draft RGS) planned for completion in 2023.

As outlined in Part 13 of the *Local Government Act*, a major aim of regional growth strategies is to avoid urban sprawl and promote settlement patterns that minimize the use of automobiles and encourage alternative forms of transportation. Both the 2004 RGS and the Draft RGS have policies to support this by promoting the development of complete and sustainable communities. Complete communities look different depending on the context, but the overall goal is communities that are compact, provide a range of transportation options, and are in close proximity to amenities and services to provide for people’s day-to-day needs (e.g. places of work, parks, grocery stores, healthcare, etc.).

Collaboration with Indigenous Communities

- The development’s proponent has indicated that they have reached out to Sq’ewlets First Nation and Leq’a:mel First Nation and that the proposal is supported by Sq’ewlets First Nation. The Draft RGS strongly supports collaboration with First Nations and the project would provide several opportunities to work with Sq’ewlets First Nation on priorities for their community.

Regional Growth

- Both the 2004 RGS and Draft RGS expect that the majority of future growth will occur within the regional growth boundaries of the FVRDs municipalities, with minimal growth occurring in the Region’s rural electoral areas. The Draft RGS expects 90% of future growth to occur within the designated regional growth boundaries, primarily within the municipal urban centres.
- For the scale of the electoral areas, the proposed development is a sizable increase in population. The existing community of Lake Errock has 166 private dwellings and a population of 343 persons per the 2021 census. The proposed development with 155 single family lots, plus a townhouse site (68 units) and two low-rise apartment sites (67 units), would more than double, if not triple, the existing population.
- Growth in the electoral areas is encouraged to occur within existing communities. The proposed development is directly across the highway from the Lake Errock community, but

Highway 7 and the CP rail line are significant barriers separating the proposed development from Lake Errock. While adjacent to the existing Lake Errock community, the development site can be considered outside of the existing community.

Financial sustainability

- The 2004 RGS and the Draft RGS require that communities be financially sustainable and self-sufficient. The development is adding a significant population to the community, and the new residents and businesses will be requiring services. It is important to understand how the development could impact, positively or negatively, the long term financial sustainability of the community.

Housing and related services

- The proposed development contains a range of housing types, and both the 2004 RGS and Draft RGS support the development of diverse housing types to help with affordability and allow for a range of lifestyles. Denser developments should generally be located within the regional growth boundaries of the municipalities and near services and amenities that better support alternative forms of transportation.
- The proposal includes several multi-family sites including townhouses and low rise apartments which may have implications for emergency service requirements (i.e. fire response to apartment structures). A more detailed assessment of fire service requirements and impacts should be considered to ensure that the area's fire services will meet future demand. The forest-fire interface zone should also be considered.
- The closest public school to the proposed development is located in Deroche. Consideration should be given to the potential impact such population growth will have on existing school facilities.

Rural Character

- The 2004 RGS and Draft RGS both speak to the importance of preserving and maintaining the rural character of the Region's electoral areas. The rural character and way of life is why many people live in the electoral areas, and maintaining this is important for existing residents' lifestyles; for protecting agricultural lands, natural resources, and natural areas; and for supporting the rural economy.
- As part of the RGS public engagement process, there was clear concern expressed by rural electoral area residents about the importance of maintaining the rural way of life.

- Both the 2004 RGS and Draft RGS support accessible parks and trails, including in rural areas, and parks and trails are included in the proposed development. If the expectation is that proposed parks and trails will be managed by the FVRD, the proposal should be reviewed by the FVRD's Regional Parks department.

Ecosystem Health

- The 2004 RGS and Draft RGS speak to the importance of protecting the natural environment. The existing community of Lake Errock is on septic fields with known historic private septic system failures. The proposal provides land area for future sewage treatment but does not include adding sewer capacity or connections for the existing Lake Errock community.

Transportation Options

- There are very few amenities or places of work near the proposed development. Outside of close access to natural areas, the development will be car dependent. The closest commercial centers in the area are Agassiz (20 min drive) and Mission (25 min drive).
- The Draft RGS contains plans for a potential rural bus route along Highway 7 which would pass by the development. The bus service, while planned, will be a rural standard of service in that service may be relatively infrequent providing peak time services in the morning and afternoons. The proposal is unclear about its connectivity to support day-to-day needs of the prospective residents.

The development should take into account the proposed bus service, ensuring that a suitable site is available for a future bus stop on Highway 7 that meets BC Transit standards.

- Highway 7 and the CP rail line are significant barriers separating the proposed development from Lake Errock. Residents in the proposed development will likely want to walk or bike to and from the lake, but they need a way to do so safely.

Climate Change

- The Draft RGS contains policies to ensure that land use planning decisions take into account GHG emissions and the impacts of developments on climate change. Compact developments with a range of transportation options and nearby amenities generate fewer emissions than more sprawling and isolated developments that are car dependent.
- The 2021 heat dome and atmospheric river events highlighted the potential for issues to arise in emergencies such as wildfire and other risks. With more people living in isolated locations, it

can be more challenging for responding agencies to meet the needs of individuals during an emergency.

Questions to consider about the proposed development:

- Not knowing First Nations' development plans, will the proposed sewer capacity take into account First Nations' future plans?
- What are the long-term financial implications of the development for current and future residents and businesses?
- What are the implications for schools and other services, such as fire protection?
- What is the current water quality of Lake Errock and how will the proposed sewer service improve the health of the lake?
- What considerations have been given to enable residents to safely travel by active transportation means (walking or bicycle) from the proposed Harrison Rise development to Lake Errock and back?
- Are there opportunities to improve active transportation connections to nearby amenities such as the proposed Sts'ailes Health Centre and the Sq'ewlets First Nation community centre?

Conclusion:

Most aspects of the proposed development are inconsistent with the RGS. While there is no specific threshold at this time for developments being too large or dense for the rural electoral areas, a series of developments of this scale would lead to more growth in these areas than envisioned in the 2004 RGS and the Draft RGS. These types of developments are generally intended to be located within the urban growth boundaries of member municipalities to ensure larger populations have a diversity of transportation choices, are close to many different amenities, and provide learning and economic opportunities nearby. The rural character of the electoral areas also has the potential to be impacted by large, dense residential developments.

With that said, the development does have potential benefits that align with the regional growth strategy, specifically in terms of First Nations collaboration. There could be benefits to Ecosystem Health should the proposal be enhanced to improve water quality in Lake Errock, but at this time there is no potential improvement to the water quality of Lake Errock. There is no clear way of balancing the varying goals of the RGS, but if it can be demonstrated that aspects of the development that are inconsistent with the RGS can be mitigated and that there will be positive impacts on other RGS goals, then the development could potentially be justified as being consistent with the RGS.

Regards,

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