

**April 12, 2023: Letter of Opposition to City of Prince George Zoning Bylaw No. 7850, 2023**

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Dear Mayor Simon Yu and Honourable City Council Members,

I propose that the council refuses or defers the third reading of City of Prince George Zoning Bylaw No. 7850, 2023.

I am writing once more to express my opposition to the proposed rezoning of the 11.5 hectares of land in Meadow Park, as outlined in the 'City of Prince George Zoning Bylaw No. 7850, 2023.' I urge the city council to vote against the proposal due to the negative impact it could have on the environment, taxpayers, communities, and future generations.

The recommendation by city staff to support the zoning is not consistent with the full OCP objectives and policies. The OCP is comprised of 13 sections, and the city planners have only identified land use policies in Section 8 - built environment, when there are several sections of the OCP that deal with land use relevant to the subject property, and that do not align with the proposed rezone and subsequent development. The city's report to council states that this rezoning for development aligns with **Policies 8.1.13, 8.2.10, 8.3.7, 8.3.45, and 8.3.59**. These policies guide city planners on where to develop and how.

**Policy 8.1.13** - The city has identified a sensitive environmental area as a Phase 1 growth area which conflicts with other sections of the OCP, primarily conflicting with Section 6.

**Policy 8.2.10** - The proposed new development is not compatible with the existing neighbourhood, the presentation supplied by the developer shows the same house design repeated four times with different coloured siding. “Cookie cutter” developments do not align with the design guidelines of the existing neighbourhood, nor do they help to promote community goals or reflect local identity, as this policy states.

**Policy 8.3.7** - A traffic impact study has not been produced or made available to the public, and the existing traffic patterns are a cause of concern for development in this area.

**Policy 8.3.45** - Infill development is an alternative to urban sprawl, and is intended to prevent urban sprawl. Developing on the edge of a large section of undeveloped land at the edge of the city does not fit with the definition of infill development.

**Policy 8.3.59** - Introducing approximately 200 homes with the same footprint and replica plans does not constitute as providing a wide range of housing forms. The concentration of manufactured housing in the Hart Community is already much higher than other parts of Prince George, the proposed development would be adding to the problem of lack of diversity in housing in this area. The existing zoning provides a wider range for housing form, including entry-level housing such as apartments, duplexes, rowhousing, fourplexes, single family homes, and more. A blend of RM1, RM3, RS2, AG, and AF would provide a much more diverse housing stock.

### **RZ100778\_Submission\_Applicant**

The applicant has written a letter outlining the rationale for the proposed development, quoting consistency with the City of Prince George OCP **Policy 7.4.14**, which has brought forward some further questions. I understand soil testing has already commenced, were archaeological or aboriginal traditional use sites discovered in this location in the pre-development stages? Why was this policy referred to?

The document submitted by the applicant does not show varied roof designs or even asymmetrical designs of the plans, four of the six plans show the same design with slightly different porch access and colouring, which does not align with **OCP Policy 8.3.62**. The ‘Riverside’ and the ‘Nechako’ are the same build with the same rooflines, the same front entry point, and slightly different internal layouts.

“**Policy 8.3.62** - The City should maintain character typical of existing neighbourhoods by encouraging any multi-unit development to be asymmetrical, with varied and interesting facades, rooflines, entry points, balconies and porches.”

The proposed development and rezoning to a manufactured home park does not fit the existing neighbourhood in form or characteristics. While manufactured home parks provide residential housing, they sell differently in the real estate market. Manufactured home parks sell as investment opportunities, and potential purchasers of a manufactured home park would be

looking at pad rental income and projections for growth of wealth over time. Ancillary uses of RM9 zoned property include retail; convenience, security hubs, and office space. Those uses are not consistent with the existing neighbourhood. The size and scale of proposed housing on the same street and block would not be compatible with the **OCP Policy 8.3.55**.

**“Policy 8.3.55** - The City should require buildings to be of a size and scale that is compatible with nearby (e.g., on the same street or block) buildings. The following restrictions apply to all development: The maximum building height is four storeys. Such sites should not fragment neighbourhoods or lead to undue traffic within local neighbourhood streets. Proposed development along Corridors should be subject to access and traffic analysis considerations.”

The developer refers to Western Acres as an example that property values would not be adversely affected with the rezoning and development of a 200+ manufactured home park, however that is not a realistic comparison. Western Acres had a small handful of modular and manufactured homes built on individual lots. The comparison being made is to fee simple property which trades differently in the real estate market than strata, leased, or rental units. Furthermore, the existing properties in the Western Acres subdivision are all much older homes, which would benefit from newer homes being built in the neighbourhood. The Twinberry subdivision has been built over the past 2 decades; it is a different housing stock compared to what was preexisting in Western Acres. A manufactured home park would be a large, dense income-generating development directly beside the existing housing, which would not fit with the current character and form, no matter how you try to rearrange the roof lines, and would not align with the **OCP Policy 8.2.10**.

### **Land Use - Environment and Conflict with the Official Community Plan**

The city has identified this as a growth area, but I believe they need to revisit this designation as there are several environmental concerns on the proposed development land which conflict with the Official Community Plan. The area should require a full environmental impact study before any kind of development, regardless of what kind of zoning exists or is being proposed. There are multitudes of western toads that migrate from the pond each year through the land set to be developed, to the point where the locals jokingly call the access road ‘Toad Road.’ In the spring and summer, the wetland area between the Twinberry subdivision and Meadow Lake is inhabited by several types of birds. In our first year living here, we have seen herons, woodpeckers, hummingbirds, yellow finches, robins, sparrows, crows, ravens, warblers, chickadees, waxwings, young and bald eagles, and so many more that we haven’t identified. I have lived in Prince George nearly four decades, living in both the urban and rural areas, and I have not observed the variety and number of birds as I have seen this past year looking back to the land between Meadow Lake and Twinberry Drive as in any of the other locations I’ve lived.

The majority of the proposed development land in the 11.5 ha area is identified on the PGMap ecology layers - general sensitivity classifications as being 'provincially sensitive,' with a small portion being classified as 'locally sensitive,' and approximately 1.45 hectares being identified as 'common.' I'm surprised that the City of Prince George would consider such a large section of an environmentally sensitive area as a growth area considering how extensively the OCP speaks to protecting our environment.

The following sections of the OCP outline how the proposed rezoning and development are not well fitted for 9153 Twinberry Drive.

**Section 2.6** of the City of Prince George OCP defines some of the key issues as Improving air quality; preparing for and responding to climate change; minimizing infrastructure costs, and helping to keep taxes low. By approving this rezoning, increasing traffic to the outer limit of the City would have the opposite effect of key issues identified in the OCP.

**Section 6.1** of the OCP refers to Clean Air and lists a number of objectives to reduce air pollutants. Again, by encouraging further development at the city edge the result would be heavier air pollution and conflict directly with the objectives of the OCP.

**Section 6.2** of the OCP speaks to Clean Water and specifically addresses wetlands and riparian zones, with objectives set out to protect the water, "groundwater supports river flows and supplies wetlands, lakes and other important natural features. Groundwater protection and management is an often overlooked but vital part of work that the City of Prince George carries out." **Objective 6.2.2** sets out to, "Preserve, protect and restore riparian and wetland areas to maintain and enhance water quality and quantity, and the ecological functions of watercourses so they continue to support healthy fish and wildlife populations." The area set to be developed has an annual Western Toad (*Anaxyrus boreas*) migration from the pond to the surrounding area, including across the development land to the Twinberry subdivision. The Western Toad is on Schedule 1 of the federal Species at Risk Act, and is sensitive to any land changes according to COSEWIC documentation. The proposed development could be detrimental to the species in this area, and the city should be employing **Policy 6.2.24**.

**Policy 6.2.24** The City recognizes the importance of wetlands and the need for their protection and/or rehabilitation in land use planning and should work to identify and develop recommendations to protect wetlands.

**Section 6.4** of the OCP speaks at length about green practices, and is very pertinent to the subject land: "**Objective 6.4.41**; The City should require information to determine if there is any special wildlife or species at risk (including their habitat) prior to development and infrastructure planning. Projects are to be directed away from these areas."

While there is a neighbourhood centre in the Hart Highway, it is very limited in what it offers and so the majority of people living in the Hart still need to drive to town. According to Stats Canada, driving accounts for 60% of Greenhouse Gas Emissions, and a high density population so far removed from the city center amenities would result in higher household carbon footprints. The city council has authority to address this concern under the **Community Charter, Section 53 (C)**. Furthermore, **Section 6.5** of the OCP has numerous objectives to reduce greenhouse gas emissions. **Objective 6.5.4** of the OCP states “Recognize the role of our natural environment in climate change mitigation and greenhouse gas emission reduction in land use decisions.”

The vision of the OCP states “Over many years, many decisions large and small should add up to achieve the community vision. In a sense, every decision counts. For this reason, principles for planning and decision-making are critical.” The decision that the council faces today with this rezoning is no exception. Some of the principles based on the OCP vision include:

“Engagement: engage the public and stakeholders broadly and authentically in decisions, providing for open and transparent dialogue; Emphasize options to the car: support a range of attractive mobility choices, including walking, cycling, and transit, Create “people places”: in planning and design decisions, aim to make beautiful, attractive places for people first and foremost..” The proposed area for rezoning does not offer any mobility choices set out in the OCP, and the proposed development shows 6 housing plans, with only 3 designs - one of the designs is repeated 4 times with different coloured siding or windows.

The OCP Financial Plan emphasizes the need to "avoid urban sprawl" and prioritize "settlement patterns that minimize the use of automobiles and encourage walking, bicycling and efficient use of public transit." The proposal to build 220 manufactured homes at the edge of the city causes more urban sprawl, a problem that Prince George does not need more of. The increased traffic from a higher number of people driving to and from Prince George would heavily increase the carbon footprint of the area, and would conflict with the City of Prince George's Official Community Plan. It would also cause more overland pollution in an environmentally sensitive area. There are numerous sites available for development much closer to the city core that would be better suited for the intended development, and that would help prevent urban sprawl at the outskirts of the city.

### **Land Use - Lack of suitability with the existing neighbourhood**

The developer and L&M Engineering speak to the need for diversification with housing. This is exactly why the existing zoning is important. When looking at the City of Prince George as a whole, manufactured homes and manufactured home parks are abundant in the Hart Highway area already, more so than any other part of the city. The Hart community needs more diversification in housing, with other forms of multi-family such as duplexes, fourplexes, and apartments which are already zoned for the subject area. If the city continues to allow rezoning to manufactured homes and manufactured home parks then the area will become more oversaturated with this static type of housing than it currently is.

## **Land Use - Traffic Concerns**

The neighbourhood is currently only accessible by road directly off Highway 97 via Burgess Rd, and there is no existing road system to connect to other neighbourhoods. Without a sidewalk, streetlights, or city bus service reaching the neighbourhood, it would be difficult to access for those without a vehicle, and would be dangerous for anyone attempting to walk the 90km/hr highway to reach the nearest bus stop. Which means that people considering buying in the area will need to rely on driving. An increase of traffic in the range of 220-440 vehicles (1 to 2 vehicles per proposed home) through the existing access is a cause for concern considering the amount of snow we get in this area, and how narrow the roads become in the winter.

In conclusion, this location is not ideal for the proposed development. Therefore, I urge city council to vote against the proposed rezoning of Meadow Park.

My best regards,

Heidi Palmer, BBRE, DULE, RI