
Subject: Written Submission - CP100164 - Bylaw No. 9156
Attachments: CP100164 - Bylaw No. 9156 - Submission.pdf

From: Leah Lampert **Redacted**
Sent: Friday, April 09, 2021 6:23 PM
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Cc: lampi **Redacted**
Subject: Written Submission - CP100164 - Bylaw No. 9156

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Your Worship Mayor Hall and Council (Council):

I have spent a great deal of time in the last month thinking about and researching the above noted amendments before you.

I am mindful of the limited time Council may have and the extensive information contained in these submissions. As such, I have taken the (perhaps) unusual step of sending this information directly to each of you so that each of you may have sufficient time ahead of the Public Hearing to read, consider, and seek further information regarding these submissions as you may require.

I hope that you will find this information useful as you contemplate these amendments.

Respectfully submitted,

Leah Lampert

Redacted

RE: Official Community Plan Amendments Application No. CP100164 (Bylaw no 9156)
and Rezoning Amendment Application No. RZ100678 (Bylaw No 9157)

Your Worship Mayor Hall and Council (Council):

I have spent a great deal of time in the last month thinking about and researching the above noted amendments before you.

In preparing these submissions, I have relied heavily upon the information readily available on the City of Prince George (the City) website.

I have also used the following sources:

- The Hub Collection Ltd. (developer) website
- Articles contained in The Prince George Citizen digital feed and/or digital edition
- CMHC – Housing Market Information Portal
- The Government of Canada website
- The Government of British Columbia website

This report is not based on any personal opinion, and for the most part, to the extent that it is possible, I have attempted to rely on factual information and suggest to Council some questions, or considerations, that I believe may reasonably arise from this information.

I am mindful of the limited time Council may have and the extensive information contained in these submissions.

As such, I have taken the (perhaps) unusual step of sending this information directly to each of you so that each of you may have sufficient time ahead of the Public Hearing to read, consider, and seek further information regarding these submissions as you may require.

I write then, requesting that Council carefully consider these submissions and use this information as part of your collective deliberations on these matters.

I hope that you will find this information useful as you contemplate these amendments.

Respectfully submitted,

Leah Lampert

Redacted

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A. Amending The Official Community Plan (OCP)

A.1 Current And Future Land Use Designation And Reasonable Expectation

The City's OCP website page advises that the OCP is a statement of objectives and policies to guide decisions on planning and land use management in the City and notes that Council, staff and citizens use the OCP as a critical planning tool to help make decisions related to:

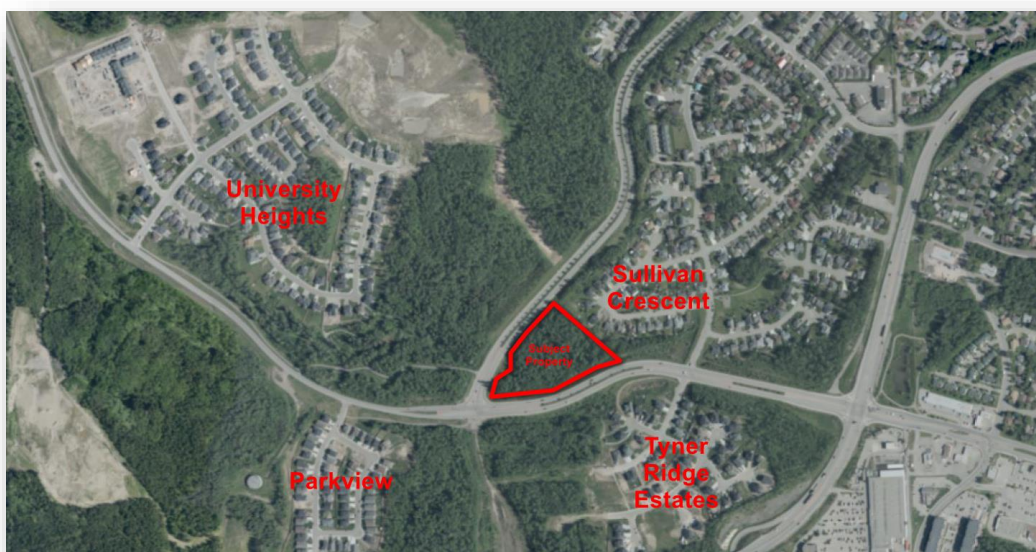
- housing locations;
- transportation priorities;
- land protected from development;
- protecting development from hazards; and,
- providing services for more sustainable development.

The OCP therefore is a foundational document relied upon by all, and it is of fundamental importance to all those who wish to live, work, invest, and play in the City.

Prior to the first and second reading of these bylaw requests, Council was provided with a report submitted by Acting Deputy City Manager, Ian Wells, dated February 11, 2021 (report to Council).

In this report, Mr. Wells advises Council that "Administration notes the subject property is adjacent to an existing neighbourhood with predominately single-family homes."

I would like to provide Council with the following map.



This map clearly shows that the subject property is actually surrounded by a number of predominately single-family residential areas.

Some residents of these areas will literally have this development in their backyards.

Many residents of these areas will be able to see this development from their houses, yards or decks.

All residents must use either Ospika or Tyner Boulevards when going to and from their houses. As such, all residents in these areas will likely walk, ride, or drive by the subject property many times a day.

All residents of these areas will most certainly be impacted by the noise, traffic, loss of green space and other concerns that will come with the significant increase in density this proposal represents.

Collectively, the private investment in these neighbourhoods easily represent tens upon tens of millions of dollars.

For individual homeowners, however, in most cases it is hard to overstate how important their investments, financial and otherwise are to them.

Of course, all of these decisions have been predicated on the current and future land use planning information that is contained in the OCP.

As per the OCP, the current and future land use designation for the subject property is "neighbourhood residential."

Council is advised in the report that "this designation is intended to ensure change in existing neighbourhoods is in keeping with existing character and scale and encouraging incremental, small scale development whose impacts are relatively minor. This designation permits a wide-range of housing forms having a density of 22 units/ha."

City staff made the obvious statement that the current land use designation "does not support the proposed apartment use and density of the proposed RM5 zone."

I would like to add what should be equally obvious statements.

The residents of these areas, in good faith, invested and built in these areas expecting the area to remain low density. They relied upon the information in the OCP and placed their trust in the City and Council to ensure that any future development in this area

would be incremental, small scale, low impact, and that such development would retain the existing character and scale of their neighbourhoods.

Any change in land use, particularly one that would allow rezoning to permit a development of such scale and density, represents a significant betrayal of their expectations, investments and trust.

Very simply, while perhaps expecting some development based on all planning information and advice they received from the City, no one in these areas could have imagined that the City would contemplate building a 256-unit, 4-story apartment complex in the middle of their neighbourhoods.

A.2 Reasons To Consider A Change From Neighbourhood Residential To Neighbourhood Centre, Corridor?

Council is advised in the staff report that “An OCP is not intended to be a static document but should adapt to new trends and respond to changing circumstances.”

This report further advises that the “ Local Government Act explains that all bylaws enacted or works undertaken by Council after the adoption of the OCP must be consistent” and that “ following appropriate public consultation and careful consideration by Council, policies and land use designations in an OCP may be revised”.

Given that the information in the OCP is so critically relied upon by so many, and given that this proposed amendment demonstrably has such significant impact on so many within the City, Council may wish to consider exactly:

What ‘new trend’ or changing circumstance is motivating this proposed amendment?

One might think that whatever this answer is, it must be very compelling.

Indeed, one might expect that any potential benefits of the proposal must clearly, and overwhelmingly, outweigh the negative impacts that residents will experience.

Council may, or may not, be surprised to find that there is very little information available that speaks to this question, let alone addresses it in any direct way.

Mr. Price, of the Hub Collection Ltd. (developer), is quoted in the Prince George Citizen (the Citizen) on March 5, 2021 describing this development as a “bit of a different model” and that this project would “have all the bells and whistles” in terms of student amenities.

The Hub Collection Ltd. website provides some information regarding this “different model” Mr. Price references. This intended complex seems to be unaffiliated, privately-owned, student housing that will provide students the option of renting a small independent micro-apartment of about 300 square feet in which they can relax and make a meal.

The “bells and whistles” that Mr. Price refers to seem to be amenities including a coffee bar, a commercial annex, shared study space, a roof top patio, a fire pit, monthly social events and shared recreation space including a gym. Most of which, of course, are available to students who elect to live on campus.

In that same Citizen article, Mr. Price acknowledges that there is a similar project nearing completion downtown, but states that his company “believes there is sufficient demand” to support his project, and added that between UNBC and CNC “there is a shortage of spaces”.

In the absence of any supporting information, Council may well consider that any demand, or need, for this specific type of student housing has already been adequately met by the downtown complex.

Council may also consider that, particularly in light of the uncertain nature of these times and the unknown lasting affects the current pandemic may have on distance learning options, it may be prudent to properly re-assess this supposed need once the downtown complex has become operational and the pandemic ends.

Mr. Price's statement about “a shortage of spaces” seems to be suggesting that there is a general lack of student housing.

Mr. Price has not made any information available that would support this claim. If this shortage does exist, it is not something either UNBC or CNC have publicly indicated, and certainly, in terms of the general public, there does not seem to be any sense of concern or alarm.

In terms of housing options available for students, Council may consider.

- Including the downtown complex, there are at least 850 new apartment spaces¹, either complete or nearing completion, in the City; and,
- All of these new spaces are located in areas that allow students easy access to transportation, CNC and UNBC, shopping and recreational/social amenities (see Appendix A)

¹ 15th & Foothills - up to 318 based on area; Southridge - 192; 22nd Ave - 147; Downtown - 205

Council may also review the following statistics

- Vacancy rates in the City have been relatively static over the past 5 years²;
- Neither CNC nor UNBC have indicated any plans to expand, and in fact, have laid staff off citing pre-pandemic declines in enrolment;
- Census data for 2019-2020 shows minimal overall growth³;

Taken as a whole, Council may well determine that the downtown complex meets the need for additional student-only housing, and that in general, there are more than enough new and existing spaces which provide students with many good options for housing.

While this context is important to the general nature of this proposal, considering whether or not we, as a community, want or need this specific type of student housing, or in general want or need more student housing, is perhaps not the most relevant question before Council.

Of course, this question and indeed the multi-million-dollar question residents want answered is quite simply:

A.3 Why Is It So Important To Have This Development In This Particular Location?

In short, if a compelling reason exists, it certainly has not been communicated to residents and citizens in general.

The staff report to Council advises that the subject property is designated “Infill as per *Schedule B-4: Growth Management* class of the OCP” and cites OCP policy 8.1.1 which simply states that the City should encourage development within infill areas.

Schedule B-4 ([Appendix B](#)) shows that in fact, most areas within the City are designated as infill. As such, this is policy does not necessarily speak to this particular site and seems to even suggest there are likely many other areas where this project could be located.

² CMHC – Housing Market Information Portal
<https://www03.cmhc-schl.gc.ca/hmip-pimh/en/TableMapChart/>

³ Municipal and sub-provincial areas population, 2011 to 2020 (XLSX)
<https://www2.gov.bc.ca/gov/content/data/statistics/people-population-community/population/population-estimates>

In speaking to the proposed change to “Neighbourhood Centre” specifically, the report advises:

- a) this designation would allow for a project as large as the proposed 4-story, 256-unit complex; and,
- b) that this designation encourages infill “while providing residential uses adjacent to walkable amenities, such as public transit, shopping and trail amenities (policy 8.3.31) and adds the subject property is “located in an area that is located in close proximity” to all these amenities.

The report also points out that “Ospika Boulevard and Tyner Boulevard are both deemed arterial roads under Schedule B-10: 15 Year Road Network of the OCP”, and that “‘Neighbourhood Centre, Corridor’ designation is supported along arterial roads”.

These facts of course do not mean that Neighbourhood Centre, Corridor is the best land use for this area, nor do they speak to whether or not this proposed land use is even at all suitable for this area.

Essentially then, the report merely advises Council that the proposed land use designation is possible. However, just because you can, does not necessarily mean you should. To this point there is certainly nothing in the report to say why this project should be located here.

One might reasonably expect that the onus to demonstrate good reasons for why this project should be located here rests with the developer.

To date, any information from the developer regarding this is essential point is limited to what is provide on The Hub Collection Ltd. website⁴.

This website contains the following statements:

- “Everything you need is located within a 15-minute walk from all of our communities. Access to transportation, grocery stores, restaurants and health & wellness offerings, and let’s not forget your campus!!!”
- “We believe a true community shouldn’t be gated or fenced in – it should seamlessly meld into its surroundings. That’s why we choose central locations with beautiful surroundings. We encourage our guests to not only be part of the HUB community but the greater local community.”

⁴ <https://www.thehubcollection.ca/>

Of course, the irony of a developer marketing quiet neighbourhoods with beautiful surroundings while at the same time proposing to seriously diminish both aspects of this area is not lost on residents, and perhaps should not be lost on Council either.

Perhaps more to the point, while the convenient location and desirable character of the area may help the developer market this project, and even in some ways, address the question of why the developer wants to build this complex here, there has been no comments made by the developer that directly speak to why Council should consider amending the OCP to allow this project to be built in this location.

Given this, it seems that Council is being asked to specifically consider a Neighbourhood Centre, Corridor designation for this area simply because:

- a) this is the area that is most desirable to the developer; and,
- b) this is the designation that would allow for the developer's desired size and density.

This amendment proposal represents a very dramatic and significant shift from the current OCP designation. This proposal, if approved, has the potential to seriously undermine the very sizeable investments many private citizens have made in this area, and their enjoyment of the homes and neighbourhoods they have built.

Surely Council would not approve this amendment, nor would it undermine the investments so many have made in these areas, simply because staff advise it is possible and the area meets the desire of a developer?

Surely, this is not a sufficient basis to compel Council to undermine the ability of all users to rely upon the OCP.

Surely, this is not sufficient basis to compel Council to betray the trust residents have placed in the City and Council.

A.4 Directly Considering Neighbourhood Centre, Corridor

Part C Section 8 of the OCP is titled **Built Environment**.

Section 8.3 is titled **Land Use** which explains that *Schedule B-6: Future Land Use* ([Appendix C](#)) “focuses on areas having different land use policies” and lists the following areas: Downtown; Neighbourhood Centres; Neighbourhoods; Business Districts; Parks and Open Space; Utilities; and Rural and Rural Resource as land use designations.

Neighbourhood Centre, Corridor and Neighbourhood Centre Residential are shown as subset categories within the Neighbourhood Centre designation.

8.3 C. speaks directly to Neighbourhood Centres and contains the objectives and policies that relate to this designation.

Neighbourhood Centres, are described in this way:

- Unique focal points throughout the City, Neighbourhood Centres provide local shops, services, and similar amenities with new housing in a mixed-use context.
- Within centres, corridors running along major arterials and collectors function as key structural elements and mixed-use shopping streets.

While the previous map provided shows this area to be in the centre of some neighbourhoods, Schedule B-6 as attached does not indicate there is an existing or planned Neighbourhood Centre in the area of the subject property. The nearest one shown is across Highway 16, in and around Domano.Blv.

Additionally, there are no “mixed-uses” noted anywhere near the subject property.

The report provided to Council includes this surrounding land use table to further illustrates this point.

North	Ospika Boulevard and residential uses
South	Tyner Boulevard
East	Residential uses and Sullivan Crescent
West	Ospika Boulevard and undeveloped land

Schedule B-6 clearly shows that there are no areas designated as Neighbourhood Centre, Corridor that are not within areas that have been designated Neighbourhood Centres.

Council may well conclude that, by definition, the proposed land use is not appropriate as there cannot be a Neighbourhood Centre, Corridor outside of a Neighbourhood Centre.

If this is indeed the case, designating this area as Neighbourhood Centre, Corridor, without locating it within a designated Neighbourhood Centre, would be akin to designating an Industrial Area outside of a designated Business District.

Approving this amendment to allow a neighbourhood centre corridor to exist outside of a Neighbourhood Centre, would pretty much signal to everyone that anything could be built anywhere, thus rendering the OCP quite useless.

Notwithstanding, should Council determine that a Neighbourhood Centre, Corridor can be located outside of a Neighbourhood Centre, it follows that as a designation within another designation, the policies that generally apply to Neighbourhood Centres should/would also apply to Neighbourhood Centre, Corridors.

I note for Council that General Neighbourhood Centre Policy 8.3.33 states: "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:

- Development at the edge of the Neighbourhood Centre must transition in scale and use to adjacent areas ... "

While not located near, or within a designated Neighbourhood Centre, the residents of Sullivan Crescent are certainly on the edge of this proposed development.

As such, policy 8.3.33, and the requirement to transition in scale and use, should apply.

It is simply unreasonable to suggest that a 4-story, 256-unit apartment complex, and accompanying required parking lot, is compatible with the houses in either scale nor size, and/or that the proposed size of this development represents a transition in scale and use as required by this policy.

It is far more reasonable to suggest that this development represents a dramatic transformation in scale and use, and conclude that, as Schedule B-6 clearly shows, locating such a complex here is simply incompatible with the nearby single-family houses.

In any case, as schedule B-6 clearly shows, there are no areas designated as Neighbourhood Centre, Corridor located outside of areas designated as Neighbourhood Centre.

As a result, Council would be setting precedent, and may well consider that:

Approval of this amendment is NOT CONSISTENT with previous applications of this land use designation, and as such, does not meet the consistency required by the Local Government Act.

A.5 Responding To An Urgent Need

A.5.1 Climate Change

Climate change is well understood to present an existential threat to humanity. In a recent decision around the federal carbon tax the Supreme Court of Canada noted that “climate change is real” and it represents a “grave threat to humanity.”⁵

A.5.2 Environmental Considerations And The OCP

Under Part C – Objectives & Policies of the OCP, Section 6 is titled **Environment**.

The preface of this section states “our quality of life is closely linked to our physical environment and natural areas in and around the City. Residents continue to express the great value of the natural environment throughout the myPG Sustainability Plan and the OCP review process. This strong sense of stewardship and desire to protect the environment has been identified.”

“The community has provided its top goals within the myPG Sustainability Plan ... which include Clean Air, Clean Water, Green City Green Practices ... Reduce Carbon Emissions and Adapt to Climate Change ...”

In a separate report to Council dated February 10, 2021 regarding the *2020 Climate Change Adaptation Report*, also signed by Acting Deputy City manager, Ian Wells, Council is advised that the City “has a strong history in acknowledging the local impacts of climate changes and identifying measures to be put in place to alleviate these impacts”. This report further notes “the City was one of the first municipalities in Canada to develop a climate change adaptation strategy”.

In other words, the City considers itself a leader in climate change adaption, and its goals, with respect to protecting the environment and adapting to climate change, are aligned with the high priority residents place on these issues.

Given that climate change is such a high priority for residents and the City, there are, as one might expect, extensive policies in the OCP that reflect a commitment to addressing climate change and protecting the natural environment.

⁵ Supreme Court of Canada – Cases in Brief – *Greenhouse Gas Pollution Pricing Act*
<https://www.scc-csc.ca/case-dossier/cb/2021/38663-38781-39116-eng.aspx>

Part C Section 6.3 of the OCP is titled **Climate Change Adaptation**.

The preface of this section notes ...

The results of several exercises with experts and community members in Prince George indicate that the priority local climate impacts are:

- 1) *Forests;*
- 2) *Flooding;*
- 3) *Transportation;*
- 4) *Severe weather/emergency response;*
- 5) *Water supply;*
- 6) *Slope stability;*
- 7) *Stormwater; and,*
- 8) *Buildings and utilities*

... a community that proactively pursues adaptation and makes it more resilient should ultimately experience significant social and economic benefits.

In the above noted staff report dated February 10, 2021, Council is advised that

- “the economic burden of climate change impacts is expected to increase over time”
- The City of Prince George is already feeling the impacts of climate change on financial budgets
- Public Safety estimates that for every dollar invested in climate change adaptation \$3-\$5 is saved in recovery costs.

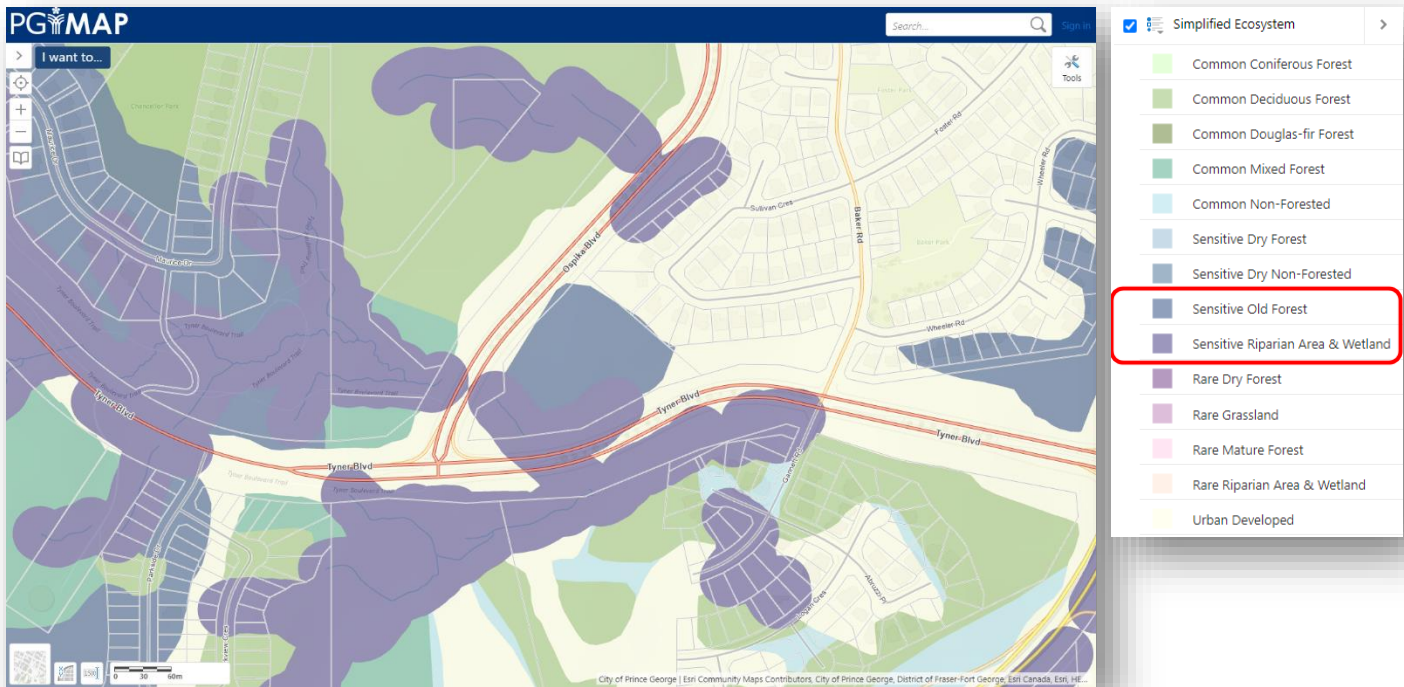
Section 6.3 of the OCP contains the following **Objectives** (Obj) and **Policies** (Pol):

- Obj 6.3.1 promote climate change adaptation in order to minimize negative climate related impacts on human safety, health and well-being.
- Obj 6.3.2 Consider climate change adaptation in all aspects of future decision making related to the priorities identified
- Pol 6.3.1 Future climate conditions and their expected impacts should always be considered in the planning, design, and construction of any new development.

Despite Policy 6.3.1 being in place, it does not appear that Council has been presented with any information regarding the environmental/climate change impacts of this proposal.

A.5.3 Protecting Environmentally Sensitive Areas

The map below, is a screen shot taken from the PGMap on the City website. It shows that the vast majority of the subject property has been identified by the City as either “Sensitive Old Forest” or “Sensitive Riparian Area and Wetland”.



In addition, the staff report regarding this amendment proposal advises, “the OCP indicates significant slopes (areas with over 20% grade) are located on the subject property” and notes that “these slopes may be subject to landslide hazards”. As a result, development should be located a safe distance from significant slopes.

While the contours of the subject property are noted on the previous map, I provide the following photos in order that Council can clearly see the streambeds and gullies on this site that demonstrate the importance of these areas in terms of run-off or storm water



Looking SE from Ospika Blvd



Looking NW from Tyner Blvd

Run-Off or Storm Water

The OCP, under the below noted sections, contains the following **Objectives** and **Policies** that directly relate to this area's importance for run-off and storm water.

6.2 B. Integrated Stormwater Management

- Obj 6.2.5 The City promotes a watershed and cumulative effects approach to riparian area protection with the aim of preserving the health of the entire watershed when considering impact on watercourses and riparian areas.

6.2 D. Watercourses and Wetlands

- Obj 6.2.11 Preserve sensitive ecosystem areas, their living resources and connections between them in a natural condition and free of development to the maximum extent.
- Obj 6.2.13 The City promotes a watershed and cumulative effects approach to riparian area protection with the aim of preserving the health of the entire watershed when considering impacts on watercourses and riparian areas.

Sensitive Old Forest

The OCP, under the below noted sections, speaks to the importance of the sensitive old forest.

6.4 B Caring for our Natural Environment & Forests

- Preface Natural areas take into account not only the wildlife and natural features of the landscape, but they are also important to residents and have a direct impact on the quality of life cherished by many. For some people it is the local park they walk in, and others it is a patch of natural forest that provides for wildlife viewing.
- Obj 6.4.2 Protect environmentally significant and sensitive areas, and the unique land features in our community
- Pol 6.4.8 The City should continue to seek ways to balance interface values such as visual quality, recreation, wildlife habitat, erosion potential, and development priorities.
- Pol 6.4.10 To adapt to climate change, forest and natural areas related planning and study should include the consideration of climate change and its effects on environmental, economic and social conditions in Prince George.

Pol 6.4.12 The City recognizes that it is important to have a mosaic of urban forests types to meet the needs of the public.

Pol 6.4.13 The value of the urban forest in mitigating climate change, improving air quality, providing ecosystem services, and achieving social objectives should be considered when weighing development options.

Pol 6.4.16 Visual quality, recreation, noise buffering, water quality, flood mitigation, erosion mitigation, climate change mitigation, slope stability, wildlife habitat, provision of privacy, shading, spiritual and cultural values, and other identified values should be considered when choosing forest management options for interface sites

Significant Slopes

The OCP, in this section, speaks to sensitive slopes.

6.4 C. Hazardous Conditions

Pol 6.4.44 It is best to avoid developing in areas subject to hazardous conditions.

Erosion and Sedimentation Hazard Areas

The OCP, under the below noted sections, contains the following Policies that directly relate to this area's watercourses and wetlands.

6.2 D. Watercourses and Wetlands

Pol 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

6.4 C. Hazardous Conditions

Pol 6.4 54 The land identified as significant slopes ... may be subject to erosion and sedimentation hazards.

Pol 6.4.57 The land shown on Schedule B-3: Significant Slopes ([Appendix D](#)) are greater than 20% grade and may be subject to landslide hazards.

Pol 6.4.58 Park and open-land recreation uses are considered appropriate within hazard areas as the threat to life and property is low. All other development should be located a safe distance from landslide hazards ...

Part D is titled Implementation

Part D 11.2 is titled Environment

Pol 11.2.5 Before land is disposed that contains riparian or environmentally sensitive areas, ensure these features are excluded from the land for sale or provide permanent protection for these areas such as covenants.

A.5.4 Considering Recent Staff Reports To Council

In the report to Council staff recommendation number four notes that Council considers this OCP amendment application “in conjunction with the City of Prince George Strategic Framework for a Sustainable Prince George and confirm there are no issues.”

This Framework is attached as [Appendix E](#).

Goals around *Environment*, and in particular *Green City, Green Practices* contained in the OCP, and as noted above, are noted as **Community Goals**.

Environment Strategy is listed as one of six **Council Strategies and Policies**

Environmental considerations are part of this Framework.

Environmental protections and stewardship are high priority values for both residents and the city.

These values are reflected in the many objectives and policies contained in the OCP.

Furthermore, given the importance the environment that residents, and the City itself have placed on this issue shouldn't these considerations be given significant weight in Council deliberations on this amendment?

Policies 6.3.1;6.4.13 and 6.4.16 all state that Council should consider the effects on developments on watercourses, riparian areas and urban forests.

As such, Council may well conclude that they should consider the environmental impact of this development proposal.

Council may also consider that residents expect them to do so.

To add to these considerations, Council was presented, on March 8, 2021 with reports from staff titled *2020 Climate Change Adaptation Report (CCAR)* and *Integrated Stormwater Management Plan Overview and Technical Background (ISMP)*.

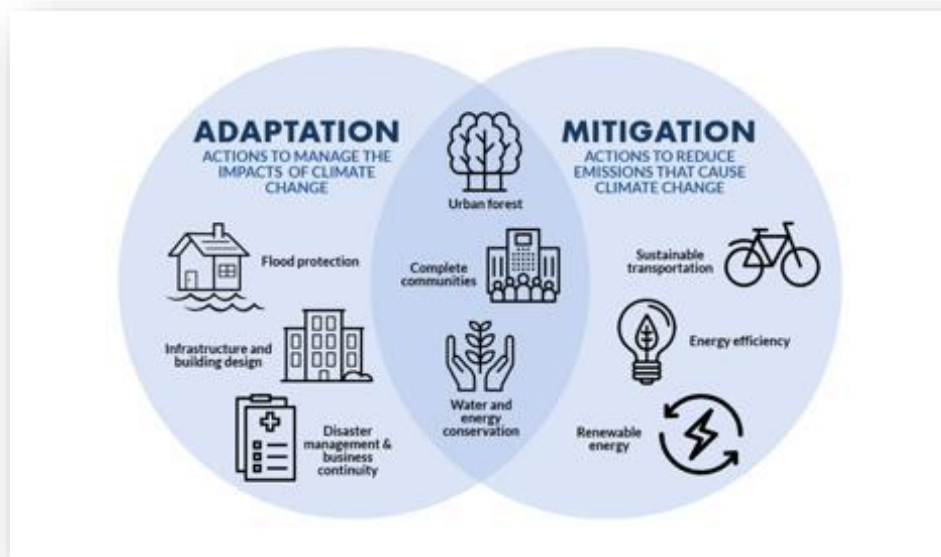
These two reports contain the following information that is relevant to the subject property.

With respect to the CCAR, Council is advised that “climate change has been described as the greatest challenge of this generation. The climate is changing globally but in Prince George, the climate is changing at an accelerated rate compared to the global average.”

Enhancing Resilience of Ecosystems and Protect Natural Areas is listed as one of four focus areas of climate change identified, and within this focus area the following relevant goals are listed

- Reduce the risk of slope failure and other erosion hazards
- Enhance stormwater management to prevent overland flooding and contamination in the context of changing climate conditions

This report also contains the following diagram that shows urban forests as particularly valuable in that they assist the City in adapting to, and mitigating, the effects of climate change.



With respect to the ISMP, Council was advised the ISMP “is a policy document that provides direction to local government, developers and landowners to preserve and enhance the overall health of watersheds, while balancing and integrating the requirements of land use planning, stormwater engineering, flood and erosion protection and environmental protection.”

Council is further advised that “some of the highest-ranking actions, that will have the most positive impact on the stormwater systems as a whole, are actually policy and regulation type actions. These include:

- developing regulations that address erosion and sediment control
- update bylaws related to stormwater (ie. tree protection bylaw)
- creating policies that better protect ecological sensitive areas (ie. wetlands and riparian areas)....

A.6 Considering A More Suitable Land Use Designation

To borrow Mr. Price’s phrase, the subject area “hits all the bells and whistles” when one considers the environmental importance of this area.

The sensitive and natural forest is highly valued by the residents in this area for their visual impact and is an integral part of the beauty and character of the area.

The sensitive and old forest is of significant value with respect to adapting to and mitigating the effects of climate change.

The sensitive and old forest is significantly, if not critically, preserving the stability of the slope and helping to ensure residents are not unduly exposed to landslides or flooding.

The sensitive riparian and wetland areas are also of significant importance in preserving slope stability, and the watercourses that run throughout this area are of significant importance in preventing flooding.

These areas are without doubt saving the taxpayers significant money by providing natural stormwater management and are an important part of the health and connectivity within the watershed.

The financial impact of preserving these areas cannot be easily estimated, nor is it easy to overstate the economic benefit the City as a whole would see if these areas are preserved.

Council may consider that there is much more value, financial and otherwise, in preserving these areas.

Council may well consider that the urgent need to take action on climate change represents a much more compelling reason to amend the OCP to protect this area (ie Greenbelt), than providing for more student housing in this area.

Council may consider that an amendment to the OCP which would protect these sensitive areas from any future development is a much better, more reasonable and well supported action than building a massive student housing complex in this area.

B. Comments Related To The Rezoning Application

B.1 Rezoning Wholly Dependent on OCP

Council is being asked to consider a rezoning request that would see the subject property go from RM1 to RM5.

RM1 as previously noted 'is intended to ensure change in existing neighbourhoods is in keeping with existing character and scale, and encouraging incremental, small scale development whose impacts are relatively minor. This designation permits a wide-range of housing forms having a density of 22 units/ ha.'

With respect to RM 5, The City of Prince George Zoning Bylaw no.7850, 2007 – Consolidated S.10.13 states "the purpose of this zone is to provide for multiple housing with a maximum density of 125 dwellings/ha for areas defined in the OCP as suitable for higher density housing.

Given that this proposal is not in keeping with the existing character and scale and in no way represents the incremental, small scale, minor impact development that residents expected and relied upon, this rezoning application is wholly dependent upon the accompanying OCP amendment application.

For clarity, I have included information regarding the rezoning request in this separate section.

Given that Council has been asked to amend the OCP solely to allow for this project to be built, Council may find that the information noted in the following sections, is in fact applicable to their consideration of the OCP amendment as well.

B.2 RM 5 Zoning And Previous Uses

As per PGMap there appear to be only 10 existing properties zoned RM5 in the City.

These properties are detailed in [Appendix F](#).

Given that RM1 and RM5 are incompatible zones, Council may not be surprised that note that none of the properties were zoned directly from RM1 to RM5. This is however, the unprecedented nature of shift that Council is now being asked to allow.

To further illustrate the unprecedented nature of this proposal, Council may note that despite the fact that all of the previous projects approved under RM5 zoning are located in mixed-use areas, NONE of them are as large, in terms of the lot size and density as this proposed development.

All of which serves to amplify and provide even more context to the discussions in the previous section regarding how truly significant the impact of these proposed amendments will be to the residents, and the neighbourhoods, in these areas.

The impacts of this development upon residents and the surrounding areas are in fact wholly UNPRECEDENTED.

To approve an OCP amendment, solely to allow this unprecedented rezoning, is far from the consistency required by the Local Government Act.

Council may well consider that building a 4-story, 256-unit apartment complex on top of one single-family neighbourhood, and in the midst of three others, in areas where no one could have expected, or foreseen, such a significant change, might have a rather chilling effect on the ongoing private investments in these, and other residential areas within the City.

Council may well consider whether it is prepared to signal to residents that anyone living near an existing greenbelt, or other under-developed area within the City, should/could not rely on Council to protect their interests, and NOT BUILD a massive apartment complex on the other side of their fence/street.

Council may well consider whether it is prepared to set such a chilling precedent. To in fact signal to all residents that their existing and future interest and investment in single-family areas can be undermined simply because a developer finds the area attractive?

B.3 Potential Mitigation Of Impacts On the Residents.

In the staff report Council is advised that “the OCP states the development within ‘Neighbourhood Centres’ should be effectively buffered from traffic, noised and visual impacts, and the bulk of the buildings should be mitigated through appropriate use of setbacks, landscaping and/or terracing or building form.”

This report further advises that if this zoning is approved, the developer “will require a Multiple Residential Form and Character Development Permit” and explains that such a permit would consider form and character, parking, landscaping and site design.”

That such a permit would be required serves as an open acknowledgement that this development will have significant, negative impact on the surrounding residents and neighbourhoods.

There is, to date no information available from the City to indicate to residents how this might be accomplished.

With all due respect to these policies, and everyone who is tasked at implementing them, Council, and indeed anyone who has taken a moment to stand at this

intersection, must surely acknowledge it is extremely difficult to design a 4-story apartment complex that fits within the character of these, or any single family residential neighbourhoods.

It is extremely difficult to “effectively buffer” residents from the increased traffic, noise, and activity levels when such a complex replaces an existing greenbelt and would be located at such a visible and crucial intersection that all must pass everytime they leave their houses.

Much like the City, the developer, on whom the onus should reasonably fall, has also not provided any information about how the impact of this project will surely have on residents will be mitigated.

As noted, the Hub Collection Ltd. Website contains an artist’s sketch of the building, a list of amenities including a roof top patio (which probably does not assist in mitigation efforts), and a planned separate commercial annex, which appears to be in conflict with RM5 zoning regulation 10.13.7 which states, “service, retail, and health services uses shall not be in any freestanding building separate for a building containing a residential use.”

Beyond that, the only other information that has been provided is that Mr. Price is quoted in the Citizen on March 5, 2021 as saying, “we are trying to design it so none of the existing neighbours can see it.”

With all due respect to Mr. Price, I will note for Council what perhaps should be quite obvious to everyone, including Mr. Price himself, that it is extremely hard to hide a 4-story, 256-unit apartment building, and the required parking lot, let alone the “amenities” planned in, amongst, and adjacent to single-family houses.

Should Council approve the amendments necessary to facilitate this project, each resident in these areas will be forced to consider whether or not they wish to live in a unanticipated major construction zone for a couple years, and if so, whether or not they want to live with all of the impacts this project will have on their homes and neighbourhoods.

If Council approves this project, the most critically desired, and in fact necessary information regarding these decisions will be the details around how the developer, and the City, plan to mitigate these impacts.

For the developer to simply imply no one should worry because they are not going to see it, quite simply, falls very far short of what residents could reasonably expect and demand.

To date, more than a month after these comments, and more than a month after first and second reading, residents and others impacted have not been provided with any more from either the City or developer with respect to this proposal.

This lack of communication from the City and developer stands in stark contrast to the fact that residents, and all those affected, have ONLY had this month in which to consider this development and submit their comments to the City.

All resident comments to the City thus far have been based on the very limited information currently available to them.

Will Council commit to ensuring residents have detailed information on how the City and developer might propose to mitigate the impact on residents.

Will Council commit to ensuring that this information is made available to residents with enough time PRIOR to the Public Hearing so that they may properly consider this information and provide well informed comments at the Public Hearing?

C. Summary And Conclusions

Council has before them bylaw amendments to change the land use designation of the subject property from Neighbourhood Residential to Neighbourhood Centre, Corridor, and rezone the subject property from RM1 to RM5.

These wholly dependent applications are requested in order to facilitate the building of a 4-story, 256-unit student housing complex on the subject property.

OCP Amendment

The areas adjacent to, and surrounding, the subject property are single-family, residential neighbourhoods in which there has been no densification and/or commercial development to date.

There is currently nothing to indicate that densification or commercialization is planned for this area.

The OCP is a foundational document for land use decisions in the City.

Under the current land use designation, residents have been relying on incremental, small scale development in these areas. Development that would have minor impacts upon the existing scale and character of these areas.

Approving this amendment will add significant noise, traffic, and other negative impacts that potentially result from increased density in the areas in and around the subject property.

Approving this amendment will result in loss of green space that residents currently enjoy.

Approving this amendment will result in significant negative impact on residents, their property values, and their enjoyment of their houses and neighbourhoods.

Approving this amendment to allow the proposed project is contrary to the expectations of small-scale development that would result in minor impacts on the residents and neighbourhoods in the area surrounding the subject property.

Approving this amendment would result in a betrayal of residents' good-faith reliance on the OCP, and the trust they put in the City and Council.

The Local Government Act requires that OCP amendments must be consistent and that such amendments should be considered to adapt to new trends or changing circumstances.

There is little information available from the City, or the developer, that indicates what new trend, or changing circumstance, would compel Council to approve this amendment.

There is even less information available from the City, or the developer, that indicates why this proposed student housing complex should be located on the subject property.

There is no information that indicates this housing complex needs to be located on the subject property, or that the benefits to residents in the City in general, outweigh the negative impacts of residents in this area.

It is not clear that the proposed land use, Neighbourhood Centre, Corridor is possible given that Neighbourhood Centre, Corridors are described in the OCP as being within Neighbourhood Centres, and the subject property is not located within a designated Neighbourhood Centre.

There are currently no areas in the City that are designated Neighbourhood Centre, Corridor that are located outside of designated Neighbourhood Centres.

This request is therefore unprecedented and IS NOT CONSISTENT with previous amendments to the OCP.

The City prides itself on being a leader in Climate change adaptation, and along with residents, places a high value on environmental stewardship and protection.

Residents expect that Council would consider the environmental impacts of development.

It appears that Council has not been provided with any information that speaks to the environmental impacts of this development.

The subject property is almost wholly comprised of areas that the City has identified as containing Sensitive Old Forest, and Sensitive Riparian Areas and Wetlands.

The OCP contains policies that indicate the City should consider the environmental impacts of development on urban forests, riparian areas, and wetlands.

The subject property is located on a significant slope and contains several watercourses.

The OCP contains policies that indicate that it is best to avoid developing in hazardous areas such as the significant slopes on the subject property.

City staff has recently presented Council with a report on Climate Adaptation. This report indicates that urban forests are important to assist in both adapting to, and mitigating, the effects of climate change.

City staff has recently presented Council with a report titled *Integrated Stormwater Management Plan Overview and Technical Background* which urges Council to ensure slope stability, by developing policies to address erosion and sediment control, to update bylaws related to stormwater, and create policies that better protect ecological sensitive areas such as wetlands and riparian areas.

The preservation of these sensitive areas is more in line with residents', and the City's, values with respect to environmental stewardship and protection.

The preservation of these areas would ensure residents are protected from hazards such as landslides and flooding.

The preservation of these sensitive areas would assist the City in mitigating and adapting to climate change, and the management of storm and run off water.

The preservation of these sensitive areas represents significant financial savings to the City and taxpayers.

The City should take action to protect these areas as they are very valuable natural assets.

The value of these natural assets to the City and residents far outweighs the potential benefits of a student housing complex that does not need to be located in this area.

Rezoning Application

RM5 is incompatible with RM1.

The City has never approved an application to rezone any area directly from RM1 to RM5.

The City has never approved the use of RM5 zoning in areas where there had not already been densification and/or commercial development.

There is no current, or planned, densification or commercial development in the areas surrounding the subject property

The City has never approved a project under RM5 as large as the proposed development.

Approving the requested zoning change is wholly unprecedented, and as such would result in unprecedented changes in the scale and character of the surrounding neighbourhoods.

Approving the OCP amendment solely to allow for this unprecedented change to single-family neighbourhoods is NOT CONSISTENT with other OCP amendments.

Approving this requested zoning change could have a very chilling effect on the extensive private investment in these areas.

Approving this rezoning change would signal to anyone in the City that has invested in residential neighbourhoods, and who live near greenbelt or undeveloped property, that the City would readily disregard the OCP and build a 4-story apartment complex on the other side of their fences, or street, if a developer wants to do so.

Respectfully submitted,

*Redacted*

Leah Lampert

Appendix A

Student Housing Options

When considering housing options for students, Council may note that there are several recently approved apartment complexes (also zoned RM5) that are either complete or nearing completion.

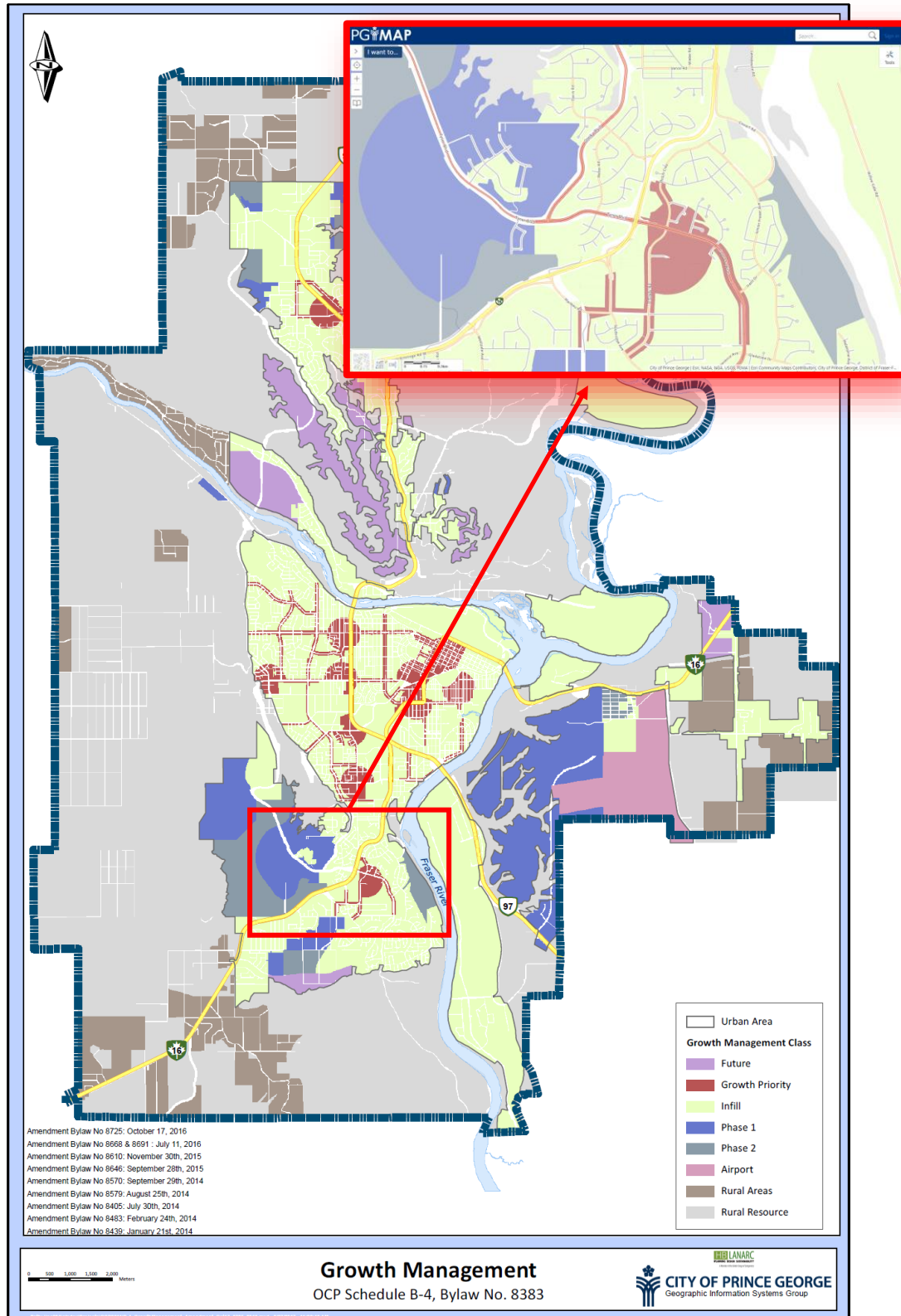
These include but may not be limited to:

- 2 new buildings located at the bottom of University Way, 1755 Foothills Blvd. (up to 318 units based on 2.5462 hectares)
- Recently completed building behind Walmart, 6611 Southridge Ave. and others under construction (192 units)
- 8 buildings under construction at 4278 22nd Avenue (up to 147 units)

While not exclusively intended for student housing, all are conveniently located near either UNBC and CNC and are well served by transit and commercial amenities.

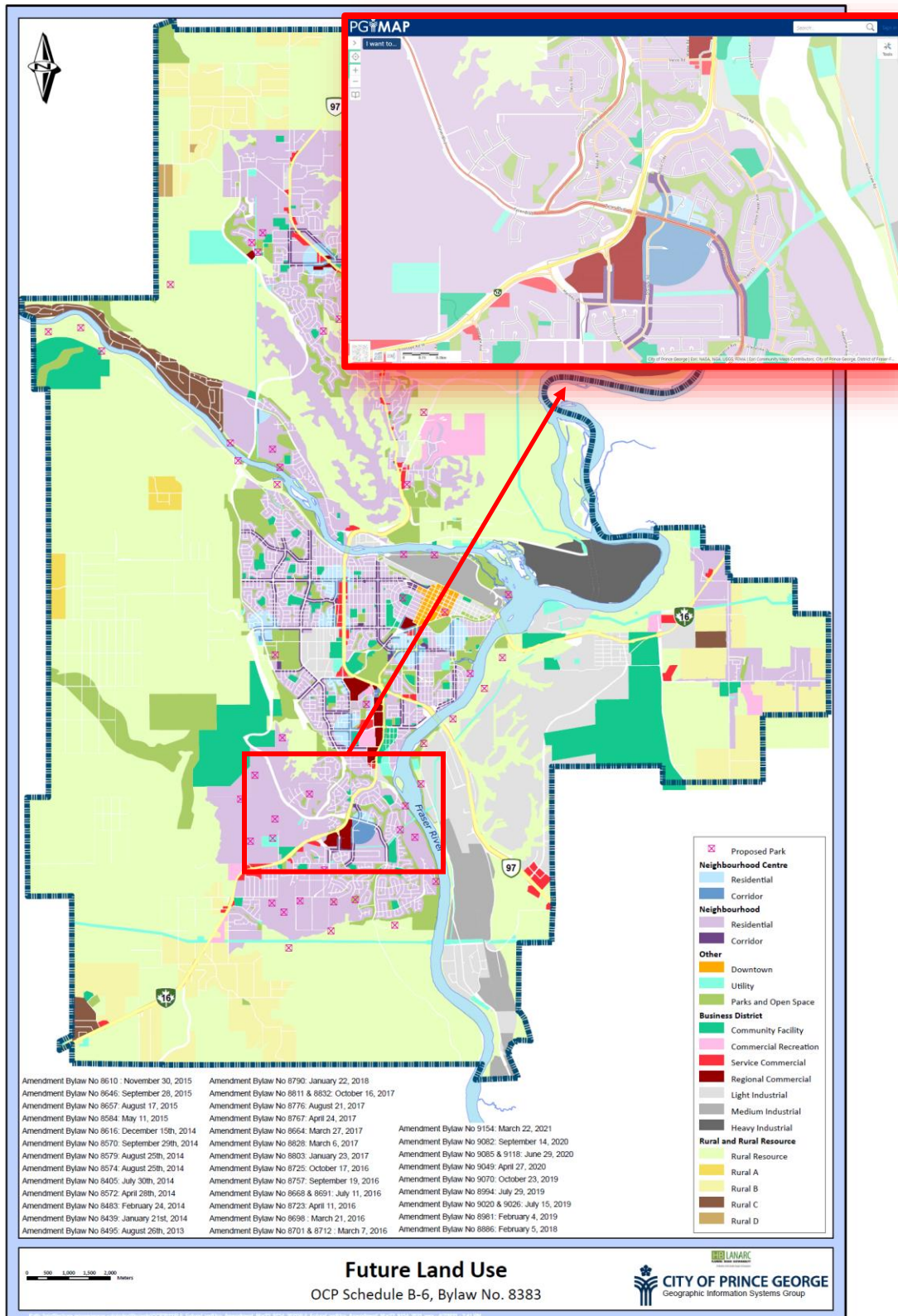
Appendix B

Growth Management – OCP Schedule B-4, Bylaw No. 8383



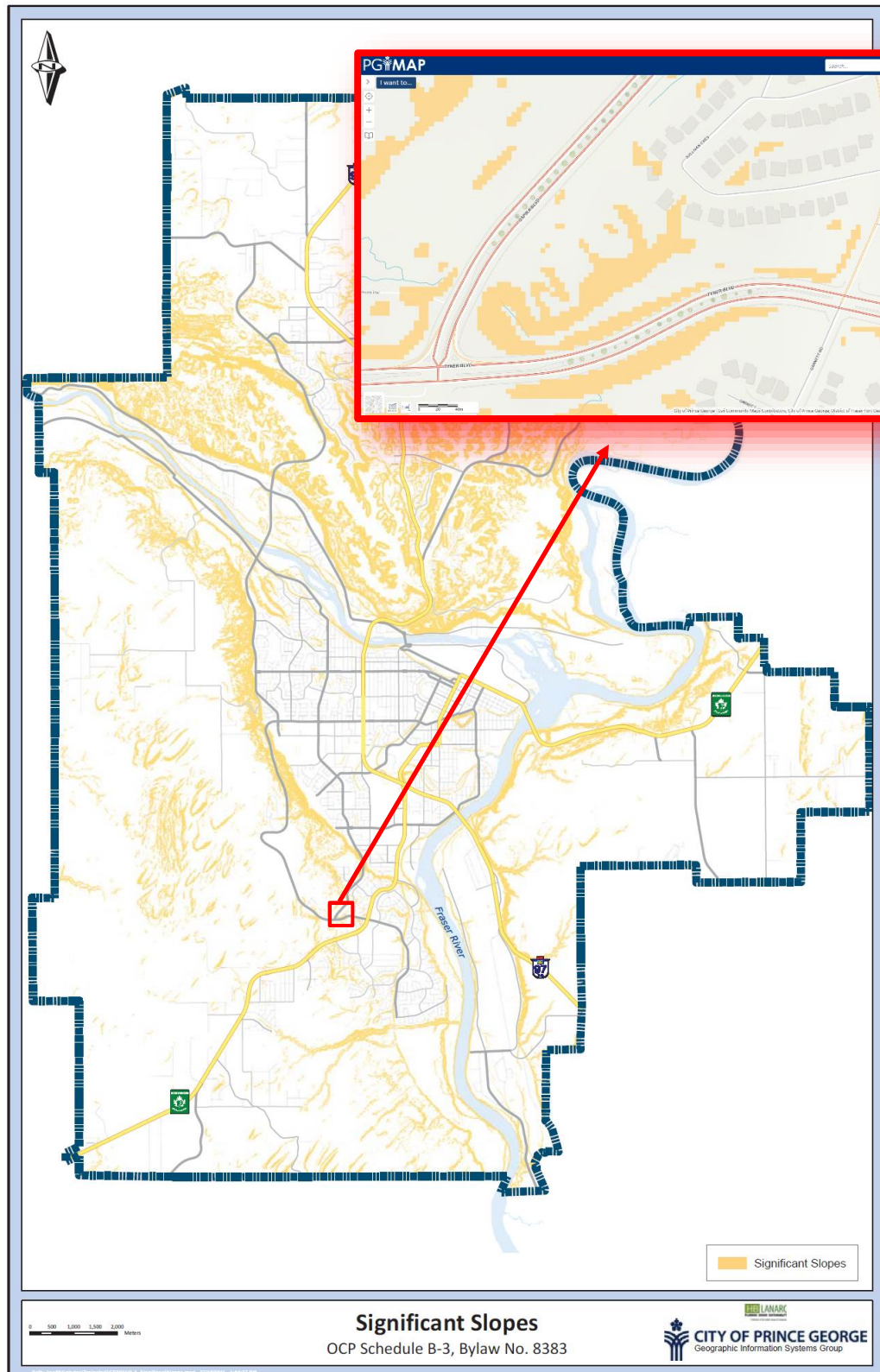
Appendix C

Future Land Use – OCP Schedule B-6, Bylaw No. 8383



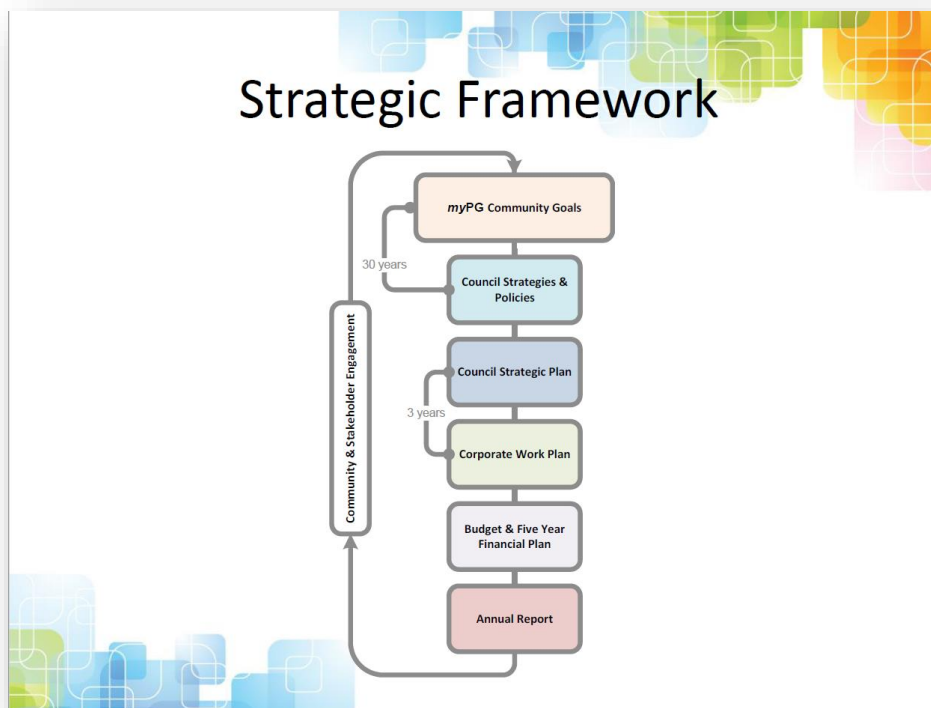
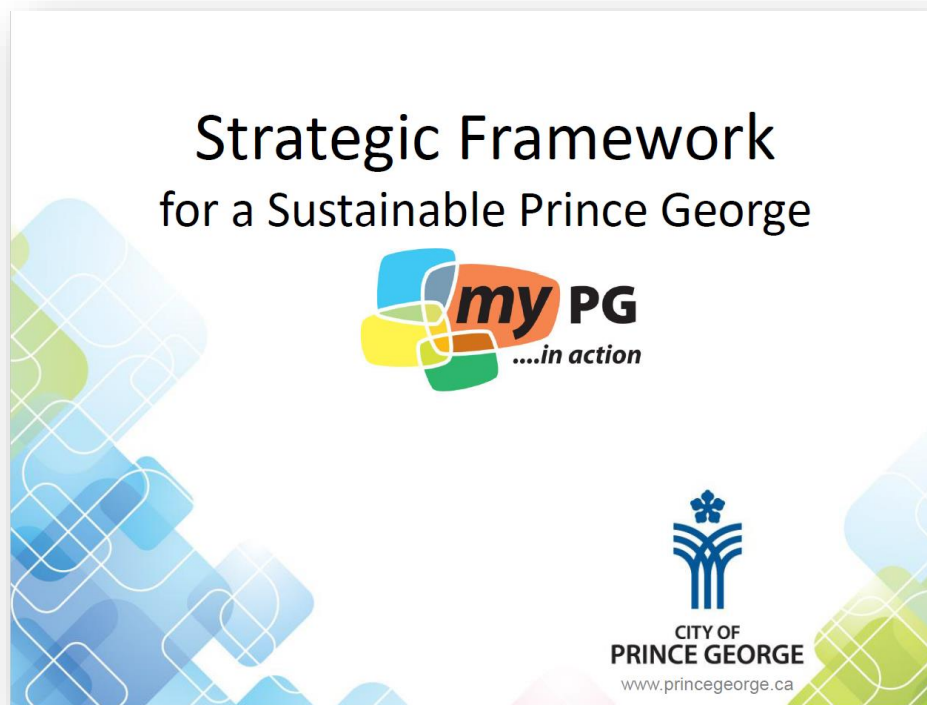
Appendix D

Significant Slopes – OCP Schedule B-6, Bylaw No. 8383



Appendix E

Strategic Framework for a Sustainable Prince George



Appendix E (Continued)

Strategic Framework for a Sustainable Prince George



Appendix E (Continued)

Strategic Framework for a Sustainable Prince George

Strategic Framework



Council Strategies & Policies

- Long Term
- Aligned with Community Goals
- Social Development Strategy
- Environment Strategy
- Economic Development Strategy
- Proposed City Government Strategy

Strategic Framework



City Government Strategy

- Sustainable Infrastructure
- Sustainable Fiscal Management
- Operational Excellence
- Healthy Workplace
- Effective Governance

Appendix E (Continued)
Strategic Framework for a Sustainable Prince George

Strategic Framework



Policy Review

- Policies support Strategies
- Policies are statements of principle
- Procedures are implementation tools supporting policy

Strategic Framework



Council Strategic Plan

- Short term
- Aligned with Council Strategies and Policies
- Provides direction to administration and informs corporate plan

Appendix E (Continued)

Strategic Framework for a Sustainable Prince George

Strategic Framework



Corporate Plan

- Short term
- Aligned with Council Strategic Plan
- Provides direction to staff
- Establishes key progress targets

Strategic Framework



Budget and Five Year Financial Plan

- Aligned with Corporate Plan
- Reflects key progress targets
- Public account of financial expenditures
- Reports measures for key progress targets for the current and next year

Appendix E (Continued)

Strategic Framework for a Sustainable Prince George

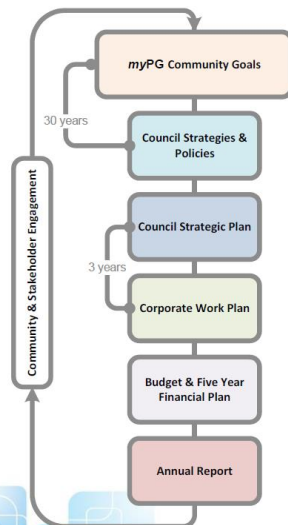
Strategic Framework



Annual Report

- Public account of financial expenditures and measures of success for key progress targets for the current and next year.
- Community and stakeholder engagement provides an opportunity to confirm or revise the **myPG** community goals.

Strategic Framework



Questions?

Appendix F

Properties Zoned RM5

1. The Chateau Seniors' Residences - 4377 Hill Avenue



2. 9 on 7th - 1964 7th Ave



3. The Riverbed Seniors' Residences – 1444 20th Ave



Appendix F (Continued)

Properties Zoned RM5

4. Aboriginal Housing Society of Prince George – 1919 17th Avenue



5. Asher Place Seniors Residences – 2908 Hopkins Rd



6. 6611 Southridge Ave



Appendix F (Continued)

Properties Zoned RM5

7. Framework 22 – 4278 22nd Ave



8. 1755 Foothills Blvd



9. 2604 Recplace Dr



10. 2918 Hopkins Rd – Currently undeveloped lot