



# STAFF REPORT TO COMMITTEE

**DATE OF REPORT** April 29, 2024  
**MEETING TYPE & DATE** Electoral Area Services Committee Meeting of May 15, 2024  
**FROM:** Development Services Division  
Land Use Services Department  
**SUBJECT:** Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307)  
**FILE:** RZ23A01

## **PURPOSE/INTRODUCTION**

The purpose of this report is to present external agency and First Nation comments regarding the application to rezone the subject properties to facilitate a four (4)-lot strata subdivision.

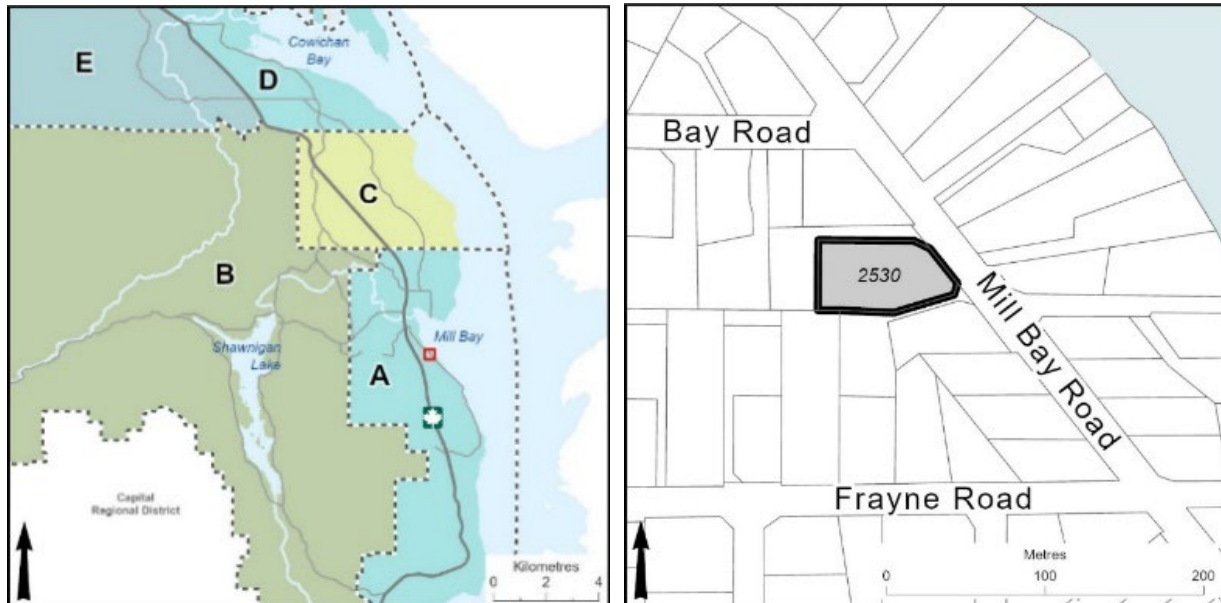
The Board is being asked to consider directing staff to draft the appropriate amendment bylaws to be considered for 1<sup>st</sup> reading at a future CVRD Board meeting. Prior to 2<sup>nd</sup> reading, the applicant will be required to provide additional information in the form of a stormwater management plan and erosion and sediment control plan.

## **RECOMMENDED RESOLUTION**

That it be recommended to the Board:

1. That an Official Community Plan Amendment Bylaw for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), be prepared and forwarded to the Board for consideration of 1<sup>st</sup> reading.
2. That a Zoning Bylaw Amendment Bylaw for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), be prepared and forwarded to the Board for consideration of 1<sup>st</sup> reading.
3. That prior to consideration of 2<sup>nd</sup> reading of the amendment bylaws for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), the following be completed:
  - a. Submission of a stormwater management plan providing an analysis of the pre-development and post-development natural hydrological conditions including peak flows and recommendations on low impact development features and design of on-site drainage works;
  - b. Submission of an erosion and sediment control plan for proposed development of onsite stormwater drainage.
4. That prior to adoption of the amendment bylaws a Section 219 covenant be registered on the property to ensure installation and maintenance of on-site drainage infrastructure and erosion and sediment control measures.
5. That prior to adoption of amendment bylaws a Section 219 covenant be registered to secure park community amenity contributions.
6. That a public hearing be scheduled for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307).

## LOCATION MAP



## BACKGROUND

The original application submission was for the property 2530 Mill Bay Road (PID: 023-004-193), which has since been subdivided into two parcels that are now the subject of this application:

- 2522 Mill Bay Road (PID: 032-165-315)
- 2528 Mill Bay Road (PID: 032-165-307)

This application proposes to rezone the subject properties from R-3 Village Residential 3 to a site-specific residential zone that would allow a minimum parcel size of 700 m<sup>2</sup> for subdivision. The proposed rezoning would facilitate a four-lot strata subdivision with a minimum parcel size of 700 m<sup>2</sup> and permit single detached dwellings on each parcel, subject to community servicing for water and sewer. Proposed accessory uses include attached suites and home-based business.

The application was last considered by the EASC on November 15, 2023. The Board passed the following resolution at the November 22, 2023 meeting:

*That Application No. RZ23A01 (2530 Mill Bay Road, PID: 023-004-193), be referred to the following external agencies and First Nations:*

- 1. Electoral Area A – Mill Bay/Malahat Advisory Planning Commission;*
- 2. BC Transit;*
- 3. Cowichan Valley School District (SD 79);*
- 4. Island Health;*
- 5. Mill Bay Improvement District (Fire);*
- 6. Mill Bay Waterworks District;*
- 7. Ministry of Transportation and Infrastructure;*
- 8. Malahat Nation; and*
- 9. Cowichan Tribes.*

A summary of referral responses received to date are provided in Attachment B.

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### **OFFICIAL COMMUNITY PLAN / POLICY CONSIDERATIONS**

#### Official Community Plan for the Electoral Areas Bylaw No. 4270 (OCP):

The subject property is designated Residential regionally and Village Residential locally, and is within the Mill Bay Growth Containment Boundary (GCB). The regional Residential designation is an over-arching designation intended to provide a wide range of housing and lifestyle options and to direct density to serviced areas.

In the Electoral Area A Local Area Plan (LAP), the Village Residential designation is intended to accommodate a range of housing types, including affordable, rental and seniors housing, and housing for persons with disabilities. Objectives of the Village Residential designation include providing an affordable housing option in Mill Bay Village and encouraging tourism activities through provision of bed and breakfast accommodation.

The subject property is within Development Permit Area (DPA) 1 – Riparian Areas Protection and DPA 4 – Aquifer Protection. Should the application proceed, Schedule U of the OCP will require amendments to include the subject property within DPA 9 – Intensive Residential Development. In Electoral Area A, DPA 9 applies to parcels less than 0.074 ha (740 m<sup>2</sup>) in area. Any future development of the site, including subdivision, may require a Development Permit.

#### South Cowichan Zoning Bylaw No. 3520:

The subject property is currently zoned R-3 – Village Residential, which permits single detached dwelling and horticulture as principal uses, and prescribes a minimum parcel size of 1675 m<sup>2</sup> for parcels serviced by both community water and sewer systems.

There does not appear to be an existing residential zone in Bylaw No. 3520 that corresponds with the proposal. Current residential zones in Electoral Area A that require a minimum parcel size of 700 m<sup>2</sup> (or less) include zones that permit manufactured home parks or Comprehensive Development (CD) zones for large developments (e.g. Stonebridge).

### **COMMISSION / AGENCY / DEPARTMENTAL CONSIDERATIONS**

See Attachment B for a summary of referral comments received.

#### Advisory Planning Commission (APC):

The application was referred to the Electoral Area A – Mill Bay/Malahat APC on January 4, 2024, where the APC passed the following recommendation to the Board:

1. *That the APC recommends that the CVRD Board not approve zoning amendment application RZ23A01 (2530 Mill Bay Road) to permit a four-lot subdivision;*
2. *That the APC supports the subdivision application for a two-lot subdivision (with suites) as presently permitted under existing zoning; and*
3. *That the APC recommends that the CVRD Board consider the following for future infill projects:*
  - *stormwater/drainage implications;*
  - *loss of vegetation;*
  - *access route standards (re: fire, safety, recycling/garbage service); and,*
  - *sewer and water servicing implications.*

Public Notice:

The applicant is required to post a development application sign prior to a public hearing. A public hearing may be scheduled following 1<sup>st</sup> or 2<sup>nd</sup> reading by the Board. Public hearing notification would occur in accordance with the *Local Government Act (LGA)* and CVRD Development Application Procedures and Fees Bylaw No. 4483.

**PLANNING ANALYSIS**

Referral Comments Considerations:

The APC did not support the application as proposed, but do support the current R-3 zoning regulations permitting the two existing lots. The APC recommended to the Board that the following be considered for future infill projects, including stormwater/drainage implications; loss of vegetation; access route standards; and sewer and water servicing implications.

Under the [Development Approval Information \(DAI\) Bylaw No. 4545](#), the CVRD may require submission of a stormwater management plan detailing how surface runoff and drainage will be managed onsite. Staff have included this in the recommendation to the Board for further information, to be submitted prior to second reading of the zoning amendment bylaw.

Existing vegetation observed during a site visit in August 2023 includes several small groups of trees (incl. Douglas-fir, maple), invasive species (Himalayan blackberry) and unmaintained grass lawn. DPA 9 includes guidelines for landscaping, including integrating landscape buffers for privacy, retaining trees where possible, tree planting along streets (where space permits), and creating landscapes that provide and/or enhance habitat value for birds and pollinators. DPA 9 requirements would be applicable at the time of subdivision.

Consideration should be made for constructing a road access that meets the requirements of the fire department (*see comments below*) and CVRD Recycling and Solid Waste Management, including a 49.7-foot turning radius for trucks. Where an appropriate turning radius cannot be provided, the CVRD can provide laneway curbside collection service; however, residents will be responsible for placing totes in the correct position.

Additional referral comments include:

- Mill Bay Fire Department – indicates support for the application provided the access road is at least 6 m wide and designed to support the load of their heaviest apparatus (38,556 kg).
- BC Transit – indicated no objection provided “Transit Supportive Land-Use and Design” recommendations are considered as part of the application, including locating on-site parking underground or away from street frontages; ensuring property access does not interfere with transit operations or create a safety hazard; and consideration given to customer amenities at nearby bus stop.

It is noted that CVRD Transit Division has confirmed they will not be pursuing additional amenities at the nearest existing bus stop.

Stormwater Management:

OCP Policy 4.8.4.5 seeks to ensure that residential developments are compatible with the physical site conditions of slope, soil types and drainage patterns. Given this application will double the permitted density on the site, and may double the overall impervious surface, staff recommend under Section 3 of DAI Bylaw No. 4545, the applicant provide the following additional information prior to bylaw adoption:

- **3.1** A stormwater management plan providing an analysis of the pre-development and post-development natural hydrological conditions including peak flows and recommendations on low impact development features and design of on-site drainage works.
- **3.2** An erosion and sediment control plan analyzing the anticipated impact of the proposed development on stormwater drainage, including recommendations to mitigate anticipated impacts on infrastructure, watercourses, ponds, lakes, wetlands, ocean and adjacent properties.

The stormwater management plan should estimate the amount of additional surface drainage that would be generated by the proposed development (four proposed lots and common property) and the options available for on-site retention/absorption, collection, storage and dispersal of such drainage. Given that additional parking is proposed to be located on the common property, stormwater management infrastructure should include an oil/water separator, in accordance with Section 7.11 of Bylaw No. 3520. Staff recommend that the plan's recommendations form part of a s. 219 covenant, to be registered on title prior to bylaw adoption.

#### Community Amenity Contributions:

The applicant has offered, as a voluntary community amenity contribution (CAC), a financial contribution in the amount of \$15,000 toward the [Mill Bay Road roadside pathway/walkway](#), identified in the Electoral Area A [Community Parks and Trails Master Plan](#). The pathway would connect the Mill Bay Village with the Brentwood Bay ferry terminal. The Board may wish to refer the potential amenity contribution to the Parks Advisory Commission (PAC) for comment.

Staff have recommended that a section 219 covenant be registered prior to adoption of amendment bylaws to secure the financial contribution at the time of subdivision.

#### Recommendation:

Given the subject properties are within the Mill Bay GCB, on a transit route and within both community water and sewer system areas, staff consider this application to be generally consistent with the OCP and residential infill development. Therefore, staff recommend that the application proceed to bylaw drafting.

Recommended additional information will aid to ensure appropriate conditions for the proposed intensified development on the properties.

### **OPTIONS**

#### Option 1:

That it be recommended to the Board:

1. That an Official Community Plan Amendment Bylaw for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), be prepared and forwarded to the Board for consideration of 1<sup>st</sup> reading.
2. That a Zoning Bylaw Amendment Bylaw for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), be prepared and forwarded to the Board for consideration of 1<sup>st</sup> reading.
3. That prior to consideration of 2<sup>nd</sup> reading of the amendment bylaws for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), the following be completed:
  - a. Submission of a stormwater management plan providing an analysis of the pre-development and post-development natural hydrological conditions including peak flows

- and recommendations on low impact development features and design of on-site drainage works;
- b. Submission of an erosion and sediment control plan for proposed development of onsite stormwater drainage.
  4. That prior to adoption of the amendment bylaws a Section 219 covenant be registered on the property to ensure installation and maintenance of on-site drainage infrastructure and erosion and sediment control measures.
  5. That prior to adoption of amendment bylaws a Section 219 covenant be registered to secure park community amenity contributions.
  6. That a public hearing be scheduled for Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307).

Option 2:

That it be recommended to the Board that Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), be referred back to staff for further information, including: *[requested information to be identified by the Board]*

Option 3:

That it be recommended to the Board that Application No. RZ23A01 (2522/2528 Mill Bay Road/PID: 032-165-315 and 032-165-307), be denied.

**GENERAL MANAGER COMMENTS**

The 2021 Housing Needs Report for Electoral Area A - Mill Bay – Malahat identified a need for 350 housing units by 2025, and mainly in small, one-bedroom units. While no affordability measures are proposed (e.g. housing agreement to secure one or more units as perpetually affordable housing), the proposed development will increase housing stock and diversity within an identified growth containment boundary.

Prepared by:



Jaime Dubyna  
Planner III

Reviewed by:



Michelle Pressman, RPP, MCIP, MPlan  
Manager



Ann Kjerulf, MCP, RPP, MCIP  
General Manager

Reviewed for form and content and approved for submission to the Committee:

Resolution:

Corporate Officer

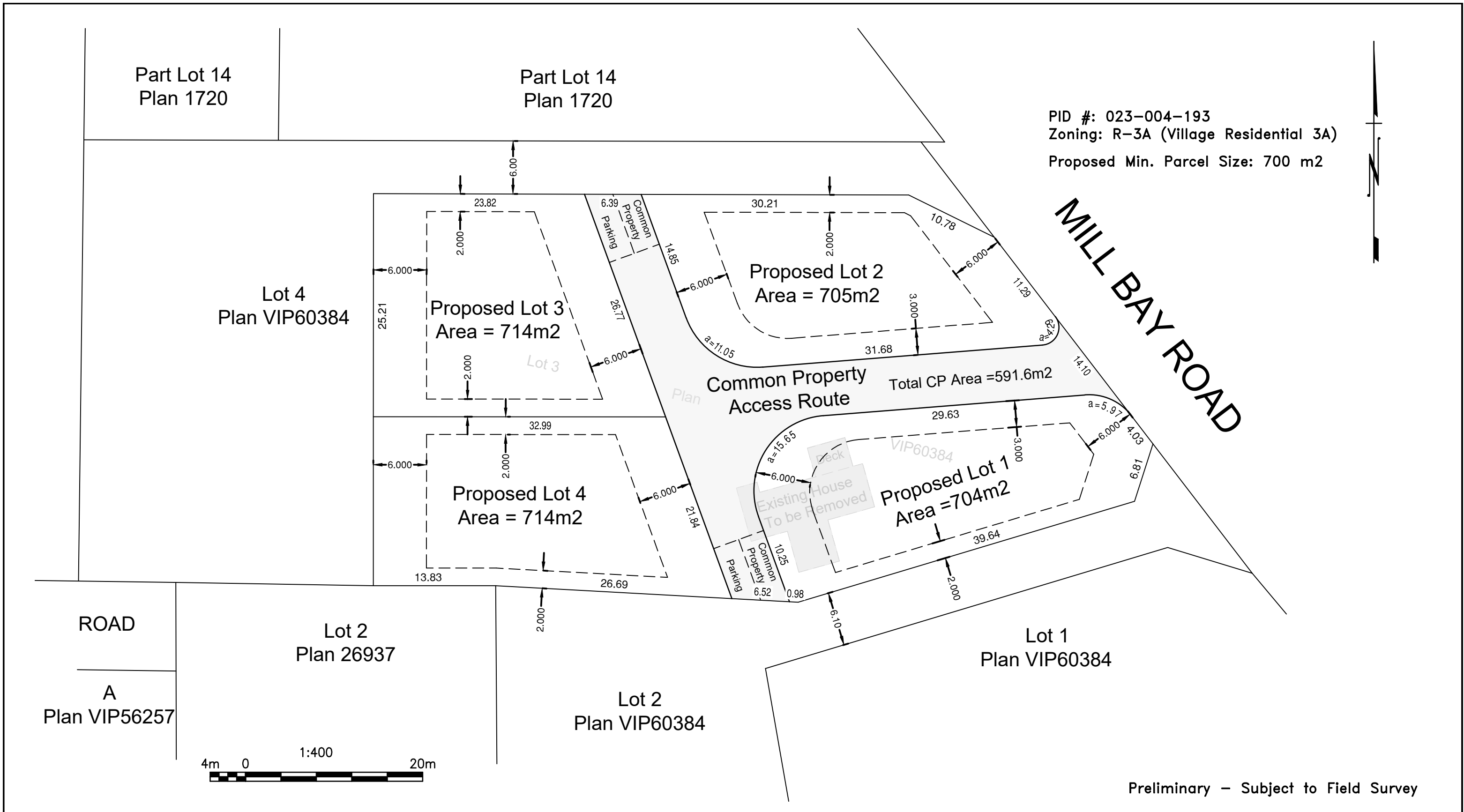
Financial Considerations:

Chief Financial Officer

**ATTACHMENTS:**

Attachment A – Plan

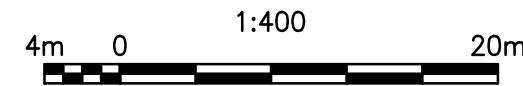
Attachment B – Referral Response Summary



PID #: 023-004-193  
 Zoning: R-3A (Village Residential 3A)  
 Proposed Min. Parcel Size: 700 m<sup>2</sup>

**MILL BAY ROAD**

ROAD  
 A  
 Plan VIP56257



Preliminary – Subject to Field Survey

<b>UNDERHILL GEOMATICS LTD.</b> ENGINEERS AND SURVEYORS VICTORIA, BC TEL. (250) 871-4599		DRAWN BY M.Laseur	JOB NO. V22CV147	TITLE Proposed Bare Land Subdivision Concept 2530 Mill Bay Road, Mill Bay BC Lot 3, District Lots 18 and 47, Malahat District, Plan VIP60384	DRAWING NO. <b>LCV-2022-147</b>	REV. 0
		SCALE 1:400m	DATE OF SURVEY TBD	CLIENT <b>Bennefield Construction Ltd.</b>	SHEET 1 OF 1	



**Referral Response Summary**

Application No. RZ23A01

<b>EXTERNAL REFERRAL RESPONSES</b>	
<b>Organization:</b> School District No. 79 (Cowichan Valley) <b>Name/Title:</b> Jason Sandquist, Secretary-Treasurer <b>Comments:</b>	<b>Date of Response:</b> December 7, 2023  <b>Level of Support:</b> No Comment
<b>Organization:</b> BC Transit <b>Name/Title:</b> Aaron Thompson, Transit Planner <b>Comments:</b> That the recommendations listed under the "Transit Supportive Land-Use and Design" section are considers as part of this application: <ul style="list-style-type: none"> <li>• Eliminating or reducing minimum vehicle parking requirements;</li> <li>• Locating on-site parking underground or away from street frontages;</li> <li>• Ensure that vehicle entrances and exits to the property do not interfere with transit operations or create a safety hazard.</li> </ul> That consideration be given to improving the customer amenities available at the nearby bus stop.	<b>Date of Response:</b> December 18, 2023 <b>Level of Support:</b> No Objection Subject to the Recommendations
<b>Organization:</b> Area A Advisory Planning Commission <b>Name/Title:</b> n/a <b>Comments:</b> <b>MOTION:</b> 1. That the APC recommends that the CVRD Board not approve zoning amendment application RZ23A01 (2530 Mill Bay Road) to permit a four-lot subdivision; 2. That the APC supports the subdivision application for a two-lot subdivision (with suites) as presently permitted under existing zoning; and 3. That the APC recommends that the CVRD Board consider the following for future infill projects: <ul style="list-style-type: none"> <li>• stormwater/drainage implications;</li> <li>• loss of vegetation;</li> <li>• access route standards (re: fire, safety, recycling/garbage service); and,</li> <li>• sewer and water servicing implications.</li> </ul>	<b>Date of Response:</b> January 4, 2024  <b>Level of Support:</b> Do Not Support
<b>Organization:</b> Malahat Nation <b>Name/Title:</b> Kate Richey, Referrals Coordinator <b>Comments:</b> At this time and with the information we have been provided, Malahat Nation does not object to the proposed amendment. We do continue to require continued disclosure on an ongoing basis regarding this zoning bylaw.	<b>Date of Response:</b> January 12, 2024 <b>Level of Support:</b> No objection

<b>Organization:</b> Mill Bay Fire Department	<b>Date of Response:</b> January 31, 2024
<b>Name/Title:</b> Chris McInerney, Fire Chief	<b>Level of Support:</b> Support with Conditions
<b>Comments:</b> As long as the access road is at least 6m wide and designed to support the load of our heaviest apparatus (38,556kg) the fire department approves this development.	

<b>INTERNAL REFERRAL RESPONSES (Nov. 2023)</b>
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<b>Organization:</b> CVRD Environmental Services	<b>Date of Response:</b> September 29, 2023
<b>Name/Title:</b> Keith Lawrence, Senior Environmental Analyst	<b>Level of Support:</b> Supported subject to recommendations outlined below.
<b>Comments:</b> The site would ultimately be drawing water from aquifer 206 through MBWD. Water supply stress is well established and understood for aquifer 206. A plan would need to be in place to support no increase to the existing water use. This plan could include analysis of historical water use and comparison to projected use with measures in place to ensure water use does not increase even though additional homes and structures may be added to the site.	

<b>Organization:</b> CVRD Community Planning	<b>Date of Response:</b> October 4, 2023
<b>Name/Title:</b> Lauren Wright, Planning Coordinator (Acting Manager)	<b>Level of Support:</b> Not supported for reasons outlined below.
<b>Comments:</b> This is a fully serviced parcel within the GCB and near transit. Although the MOCP policies (which has not been adopted) support this proposal, the current OCP policies do not overtly support this proposal. Although densification of neighbourhoods that are fully serviced is supported, this is not consistent with the surrounding context, significantly changes the character of the immediate neighbourhood, and will not work to preserve the natural landscape of the area. This proposal includes four 0.07 ha (700m <sup>2</sup> ) parcels, each with a SFD and a suite. Bylaw 4486 was recently adopted in September 2023, which reduced the minimum parcel area for suites in Area A to 0.2 ha for parcels serviced by community water. This proposal does not meet the regulations of the newly adopted amendment bylaw. It is also unclear if the proposed small parcels are able to meet the required on-site parking if suites are permitted (2 spaces for the SFD and 1 space for the suite). Overall, until the MOCP is adopted and the policies are clear for the relevant land use designation, this application is premature as the current OCP does not support this level of density for this area. Also, the addition of suites to the proposed parcels should be carefully considered, in light of regulations within the recently-adopted Bylaw No. 4486.	

<b>Organization:</b> CVRD Operations/Utilities	<b>Date of Response:</b> October 12, 2023
<b>Name/Title:</b> Louise Knodel-Joy, Senior Engineering Technologist	<b>Level of Support:</b> Supported.
<b>Comments:</b> This property is to be included in the Sentinel Ridge Sewer Service Area, which is required for both subdivision and/or rezoning.	

Capacity connection fees have been paid for a single unit and the amending bylaw has yet to be completed. Additional sewer units must be purchased and all servicing will be required by the owner.

The sewer system has capacity for either subdivision and rezoning, therefore, Utilities has no objection to this request.

**Organization:** CVRD Parks & Trails  
**Name/Title:** Tanya Schroeter, Manager,  
Parks Planning & Stewardship

**Date of Response:** October 12, 2023  
**Level of Support:** Supported subject to  
recommendations outlined below.

**Comments:**

The Parks & Trails Division is noting that in the Adopted Electoral Area A Community Parks and Trails Master Plan that a roadside pathway route along Mill Bay Road is proposed to connect the commercial village area along Mill Bay Road to the Brentwood ferry. The applicant could consider a financial contribution towards the future construction of this pathway that would take place in front of the development.

Also note that during the subdivision process that the 5% parkland dedication requirement under section 510 of the *Local Government Act* will be required. This application may be referred to the Electoral Area A Park Advisory Commission at that time to determine if 5% cash-in-lieu or 5% parkland be obtained.

**Organization:** CVRD Recycling and Solid  
Waste Management

**Date of Response:** October 13, 2023

**Name/Title:** Ilse Sarady, Senior Manager

**Level of Support:** Support with Conditions.

**Comments:**

1. *Three Stream Curbside Collection:* Pursuant to the CVRD's Solid Waste Management Plan (SWMP) the CVRD is implementing a three-stream curbside collection program for all Eligible Residence (as defined under CVRD Bylaw 1958 -the curbside collection bylaw) in Electoral Areas A to I in 2025. At this time, single-family detached dwellings, including each dwelling unit of a duplex, triplex, quadruplex, townhouse, or row house development qualify for this mandatory program. This means that each of these units will receive three rolling curbside collection totes to source-separate garbage, recyclables and organics (food and yard waste).
2. *Wild-Safe Waste Management:* as set out in the SWMP, the CVRD is committed to providing wild-safe waste management. As such, the developer should be required to help ensure that curbside collected totes will be securely stored in an appropriate 'wildlife-resistant enclosure' between curbside collection days. An appropriate enclosure may include a designated robust shed, a garage, etc. The CVRD is considering the below revisions to CVRD Bylaw 1958 to define 'wildlife-resistant enclosure'. 'Wildlife' in this instance means, bears, cougars, wolves:
  - a. "Wildlife-Resistant Enclosure" means a fully enclosed structure with solid walls, a roof and door(s), and is made of sufficient design and strength to prevent access by Wildlife.
  - b. "Wildlife-Resistant Storage Manner" means storing Garbage, Recyclables and Organics in a secure location to prevent access by Wildlife, and placing the Garbage, Recyclables and Organics in the Tote(s) on the morning of the curbside collection day.

Currently, and in the future, to prevent wildlife access to curbside material, totes cannot be set out before 5 a.m. on the collection day.

3. *Road Limitations – Curbside Truck Weight and Turning Radius:* CVRD curbside collection trucks weigh 24,500 kg when full. In short, at no time should the CVRD be made responsible for the wear and tear on the road (including Strata roads) as part of providing weekly curbside collection. Also, the turning radius is 49.7 ft.
4. *Laneway Pick Up:* the CVRD can provide laneway curbside collection service. However, residents must place collection totes in the travelling direction with the following space requirements to allow the truck to service the totes:
  - a. place the Tote(s) at the collection point near the boundary of the property so that the Tote(s) do not impede pedestrian or vehicle traffic; and,
  - b. place the Tote(s) with:
    - i. one (1) meter clear space on all sides of the Tote; and,
    - ii. three (3) meters of clear space above each Tote.

<b>Organization:</b> CVRD Strategic Initiatives <b>Date of Response:</b> October 18, 2023 <b>Name/Title:</b> Alison Garnett, Planning Coordinator <b>Level of Support:</b> Supported for reasons outlined below. <b>Comments:</b> <b>As noted in the staff report, the subject properties are designated in OCP Bylaw 4270 as Residential in Schedule A and Village Residential in Schedule B.</b> <b>This application is not proposing to amend the OCP for the Electoral Areas Bylaw No. 4270, however relevant policies include:</b> <b>Schedule B Mill Bay LAP excerpt:</b> <i>2.9.17 Village Residential Objectives</i> 1. Provide an affordable housing option in Mill Bay Village. 2. Encourage tourism activities through provision of bed-and-breakfast accommodation. <i>2.9.18 Village Residential Policies</i> The regional board: 1. Considers development variances for siting to preserve views or natural features. <b>Note: OCP Bylaw 4270 does not include density ranges associated with land use designations. Density ranges are proposed in the draft modernized OCP for the Electoral Areas Bylaw 4373.</b> <b>The density of the proposed application is consistent with draft OCP Bylaw 4373 proposed Medium Lot Suburban designation.</b> <b>Draft OCP Bylaw 4373 Medium Lot Suburban designation:</b> Purpose: Enable single detached housing with suburban character and provide opportunities for clustering units into pocket neighbourhoods. Properties in this designation typically have access to infrastructure services, such as water and sewer systems. Transportation choices are more varied with some bus routes. <b>BUILDING TYPE:</b> Detached homes <b>DENSITY:</b> Maximum 15 UPH (plus permitted suites) <b>We note that the proposed density would require the subject properties be included in the Intensive Residential Development Permit Area 9.</b> <b>An amendment to Schedule U of OCP Bylaw No 4270 would be required.</b>	
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**Organization:** CVRD Transit

**Date of Response:** October 18, 2023

**Name/Title:** Rachelle Rondeau, Transit Analyst

**Level of Support:** Supported for reasons outlined below.

**Comments:**

**The goals of the CVRD's Transit Future Plan (2012) are to:**

- Make transit an attractive transportation alternative to the private vehicle;
- Reduce the community's impact on the environment; and
- Make the transit system more efficient.

Transit friendly land use practices such as compact development in appropriately dense areas and travel demand management practices support these goals.

The proposed subdivision is located within 60 m of a transit bus stop, which is consistent with BC Transit standards for pedestrians to access transit service.