



## DEVELOPMENT PROPOSAL NO. 16 0708

The applicant proposes to develop a 278-unit townhouse complex and 23 single family small lots.

The proposal involves the following:

- an amendment to the Rosemary Heights Central NCP to amend the land use designation from "Institutional" to "Townhouses" and "Single Family Small Lots";
- an amendment to the NCP to revise the road network and the location of open space;
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# Rosemary Heights Community Opposition to the Re-Zoning and Development of Rosemary Heights Retreat Lands

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The applicant invites you to a Public Information Meeting on Wednesday, May 10, 2017 at 5:00 pm at the Morgan Creek Golf Course (Fraser Room), 3500 Morgan Creek Road, West Vancouver, BC V8M 1A1. For information on the public hearing, please contact: 604-732-7651 or 604-591-4132. Planning & Development Department: 604-591-4441.

**File Number: 7916-0708-00**  
**3690 and 3660 152nd Street**

Prepared by:  
Rosemary Heights Community Association

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## 1. Introduction

Porte Developments has applied to the City of Surrey to re-zone the property at 3660 and 3690 152nd Street (formerly the Rosemary Heights Retreat Centre) to *Comprehensive Development* in order to build 278 townhouses and 23 single-family homes on this highly sensitive riparian forest bordering the Nicomekl River. The property is the last vestige of undeveloped forest in the area.

Rosemary Heights residents and constituents have made clear their opposition to the re-zoning and to the proposed development. The arguments against this proposal are **factual, strong and indisputable**. The Rosemary Heights Community Association (RHCA) is a group of concerned residents who have volunteered to formally represent the community and its position to Surrey City Council on this matter.

## 2. Arguments Against – At A Glance

The RHCA has identified four key areas of concern with the proposal and have created sub-committees to capture neighbourhood sentiment, research, fact check and report on each respective issue. The key areas of concern are:

- Conflict with the Neighbourhood Concept Plan
- Impact on Ecologically Sensitive Riparian Lands
- Traffic Impact
- School Capacity

Comprehensive reports from each of these sub-committees are included in this package. We ask that you review each one thoroughly in order to be fully informed of the rationale for the community's opposition to the re-zoning application and subsequent development proposal.

### 2.1. Conflict with the Neighbourhood Concept Plan

- The Rosemary Heights NCP is an award-winning, highly-successful NCP that was **supported and validated by the City of Surrey, and approved in 1996**. It is the basis on which community residents have chosen to purchase their properties and its success is what makes the community so livable
- The original NCP is very specific and clear that this **property is a highly environmentally sensitive riparian forest worthy of protection under the City's Biodiversity Conservation Strategy**. Notably, the ecological complexity

and sensitivity of these lands is referenced in the original EnviroWest Report prepared in 1996. As such, it was designated for institutional/park use only. The ecological importance and sensitivity of the lands has not changed--and in fact is likely increased--since the original NCP was prepared.

- The NCP estimated 2,042 residential units and 5544 residents in the Rosemary Heights community. The current population now well exceeds this number.
- Infrastructure in Rosemary Heights, including roads, schools, parks and amenities, was developed based on the NCP. While the current population has increased well beyond the intended levels of the NCP, infrastructure has not been upgraded proportionately, resulting in overcrowded schools and significant traffic congestion.
- Porte's development plan will bring an estimated 1,000 additional residents to a community already burdened with insufficient infrastructure. Yet, they plan to connect into this infrastructure **without providing any benefit/value to the surrounding community.**
- Population density and lack of infrastructure have negatively impacted livability in Rosemary Heights. Residents have expressed repeatedly to council that development continues to be prolific and well in excess of local capacity, including the addition of Harvard Gardens and Virdian Homes, changes to the suburban pocket, additional subdivisions in the neighbourhood, and surrounding residential and commercial developments in Grandview Heights, which pose significant traffic burdens for the area. This creates further disparity between the intended population numbers set forth in the NCP and actual growth.
- The addition of yet another high-density development of the size and scope of Porte Developments' proposal, will only further detract from the livability in the community.

The Rosemary Heights NCP is a highly successful plan that resulted from close collaboration between City Planning and area residents. This proposal undermines, rather than compliments, the elements of the NCP that make the community so livable.

## 2.2. Impact on Ecologically Sensitive Riparian Lands

- Despite purchasing the property with full knowledge that the land is designated as institutional / park land, Porte Developments is seeking to eliminate a significant portion of the natural old growth forest around which our neighbourhood was designed, and replace it with high density housing.
- **The City of Surrey's own scientific research has identified the ecological sensitivity of the property and riparian forest as a key spoke in the City's conservation strategy.**

- **The property has been identified by the Surrey Biodiversity Conservation Strategy (BCS) Green Infrastructure Network (GIN) as being a major hub for animal mating and migrations. This report ranked the Rosemary Heights wildlife corridor as 5th among all of Surrey's Hub-to-Hub corridors in terms of ecological importance.**
- **Development of the property is contrary to Surrey's involvement in the David Suzuki Blue Dot movement.**
- **This is the last remaining forested area in the Rosemary Heights and surrounding neighbourhoods, and should therefore be preserved as such.**
- Given that the City of Surrey Biodiversity Conservation Strategy has designated the subject lands as "high value", ecologically sensitive and integral for preservation of the City's ecological diversity and wildlife corridors, the community is concerned that the proposed townhouse development, which contemplates removal of ~95% of the upland forest and intrusion upon the riparian slope, is not in keeping with the City of Surrey Biodiversity Conservation Strategy and Green Infrastructure Network Plans.

### **2.3. Traffic Impact**

- The road systems in Rosemary Heights were designed and built to accommodate estimated population levels identified in the Neighbourhood Concept Plan. With the population growth far exceeding the numbers in the NCP, traffic congestion, noise and safety have become fundamental concerns in the community.
- Rates of speed, congestion, traffic dodging, road rage incidents and other motor vehicle violations have dramatically increased proportionately with the population growth.
- The addition of approximately 1,000 residents to the proposed development will further exacerbate these traffic issues.
- Specific to Porte's design plans for road systems within the proposed development, the access points in and out are fraught with road safety issues, community/livability impact, and create ripe conditions for imminent tragedy.
- The applicant proposes to decimate an ecologically sensitive forest and disseminate additional traffic throughout the community's road network, but proposes no corresponding benefit to the (already-established) community.

## **2.4. School Capacity**

- Schools in the Rosemary Heights community are already far over capacity.
- 278 townhouses are the most attractive option for young families in the current real estate market. A conservative real world estimate would be 300 children. The infrastructure is simply not in place to accommodate another large influx of children.
- Overcrowding has a tremendous negative impact on the quality of education that students receive. It increases classroom discipline issues and struggling students fall further behind. Access to equipment, library, gym space, technology and playground equipment is limited and the learning environment is compromised. Parents in our community are well aware of the negative impact of overcrowding on our children's education.

## **2.5. At-A-Glance Conclusion**

The Rosemary Heights Community's position is that the current zoning of these lands as Institutional is consistent with the NCP, around which our community was laid-out and designed. In light of the deficiencies of the current proposal, residents call upon council to leave the land designation intact, and to come up with options that would fit well with the community. Institutional amenities on the already developed land could consist of a library, police station, community centre, fire hall, church, or school for example. These uses are preferable because they:

- Would have a minimal impact on infrastructure (traffic, schools, hospitals, etc.);
- Could be built within the existing developed footprint of the lands without requiring their deforestation;
- Would have only periodic traffic impacts that could be more easily mitigated;
- Are in keeping with the NCP, on which basis residents purchased their properties; and, most importantly,
- Would add value to the community.

In conjunction with the above uses, the undeveloped land containing the highly sensitive forest should be protected as park land and opened up for the benefit of city residents with walking trails.

While the excessive value of the land has been cited as an obstacle to ensuring its use contributes to the public good, in this regard the RHCA notes that:

- The land value (and therefore its range of potential uses) is set by its zoning designation (currently, Institutional), which is decided by council acting on behalf of Surrey residents and voters.
- Porte purchased these lands and exercised its option to close with full awareness of the lands' current zoning as Institutional/park land.

**Your constituents are relying heavily on your support in opposing Porte Development's re-zoning application.**





Those that apply to the retreat areas are:

- #3, to maximize the green space and retain the existing trees and natural environment;
- #4, to ensure the road system complements the integrity of the community and discourages intrusions;
- #5, to provide community facilities, schools and parks which are appropriate to serve all area residents; and
- #6, to discourage family oriented housing west of 152nd Street.

The NCP as a result of the environmental assessment, classifies this zone as having high environmental sensitivity, (p. 2-46) with a recommendation that there be **No Development within the riparian zones**. There are very clear policies stating that only walking trails, with limited community amenities and some public utilities should be constructed in this area. This is why the committee was happy with the zoning at the time.

Within the report there is a recommendation by Barbara Beblo, Senior Planner of Social Planning, that there should be a community facility built for the area. Note: this has not been accomplished but would be a potential use of the lands that would be supported by the community.

There is additional information in the NCP document that supports the retention of the riparian forest area and makes it very clear that the development of these lands is not a preferred option. It would stand to reason that after 20 years of growth, the ecological sensitivity and therefore worthiness-of-protection has only increased since the original Environmental Survey.

The applicant has repeatedly tried to argue that its proposal is consistent with the NCP, however any reasonable reading of the NCP, with its specific references to the ecological sensitivity of the lands and their protection from further development, illustrates that the applicant's position is not supported by the evidence.

It is clear that the majority of the residents living within the NCP want the city to follow these guidelines as closely as they can and that further development be consistent with the intent and principles of the NCP when it was created. Given the hours of work and input from the residents to formulate the NCP, the residents wish to reinforce that this area has a unique quality that even city council has stated needs to be maintained. That is what the residents are fighting for.

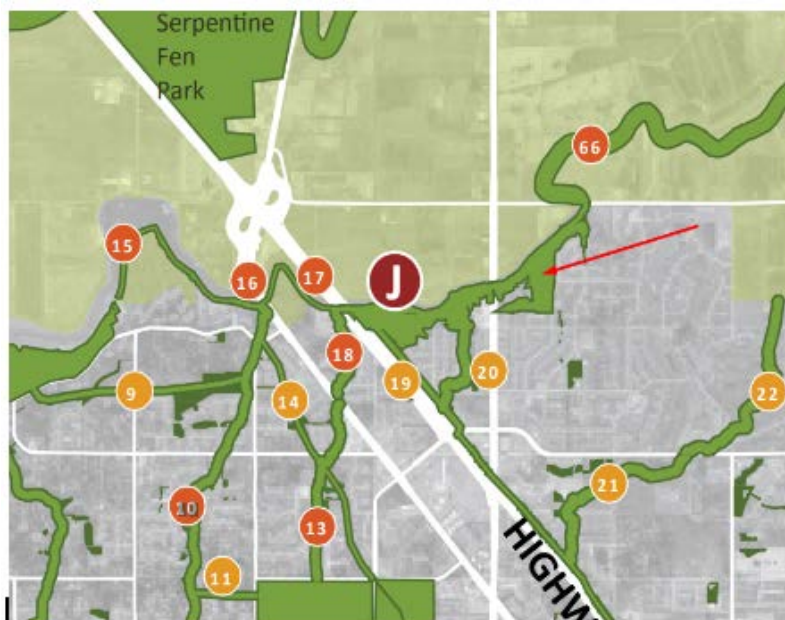
### **3.2. Environmental Concerns and Conflict with the City of Surrey's Environmental Position and Commitments**

#### **3.2.1. Preamble/Outline**

This report is prepared by the Rosemary Heights Community Association and is the product of extensive consultation with community members, archival research, and review of the various policy, scientific and ecological reports that have been prepared over the past two decades in relation to the Rosemary Heights Retreat Centre Lands. Here, we summarize concerns raised by the community about the impact of the proposed development on a protected and ecologically sensitive riparian forest. Taken together, the various concerns illustrate that the proposed development is inconsistent, and indeed in direct contravention of the City's conservation strategy.

- Surrey's Biodiversity Conservation Strategy is discussed in relation to the property
- Several ecological concerns are raised, including Surrey tree canopy, slope stability, and wind protection
- Surrey's involvement in the David Suzuki Blue Dot movement
- The Rosemary Heights Neighborhood Concept Plan is discussed to show the careful planning involved in creating a well thought out community, as well as the ultimate plans for the Retreat Center Lands

#### **3.2.2. Biodiversity Conservation Strategy**



The community is deeply concerned because the proposed development runs counter to the City's own scientific research, which has identified the ecological sensitivity of the subject lands and riparian forest as a key spoke in the City's conservation strategy, and thus worthy of protection. In fact, the Retreat Centre Lands have been identified by the Surrey Biodiversity Conservation Strategy (BCS) Green Infrastructure Network (GIN) as being a major hub (Hub J) for animal mating and migrations, including owls, eagles, deer, and many other habitat. This report ranked the Rosemary Heights wildlife corridor as **5th among all of Surrey's Hub-to-Hub corridors in terms of ecological importance:**

The five highest ranked hub-to-hub corridors are: (1) the corridor connecting the east and west portions of the Campbell Heights Northeast hub; (2) the corridor connecting the West Cloverdale North hub to the Serpentine River; (3) the corridor connecting the Upper Fergus and Lower Fergus hubs across 168 St; (4) the corridor connecting the Kensington North hub to the Campbell Heights Southwest hub across 24 Ave and 184 St; and (5) the corridor connecting the Rosemary Heights West hub to the Rosemary Heights East hub along the south bank of the Nicomekl River. All five of these corridors have an ecological significance score greater than or equal to 78.

[http://www.surrey.ca/files/Surrey\\_EMS\\_Final\\_Report\\_Consolidated\\_April\\_2011.pdf](http://www.surrey.ca/files/Surrey_EMS_Final_Report_Consolidated_April_2011.pdf)  
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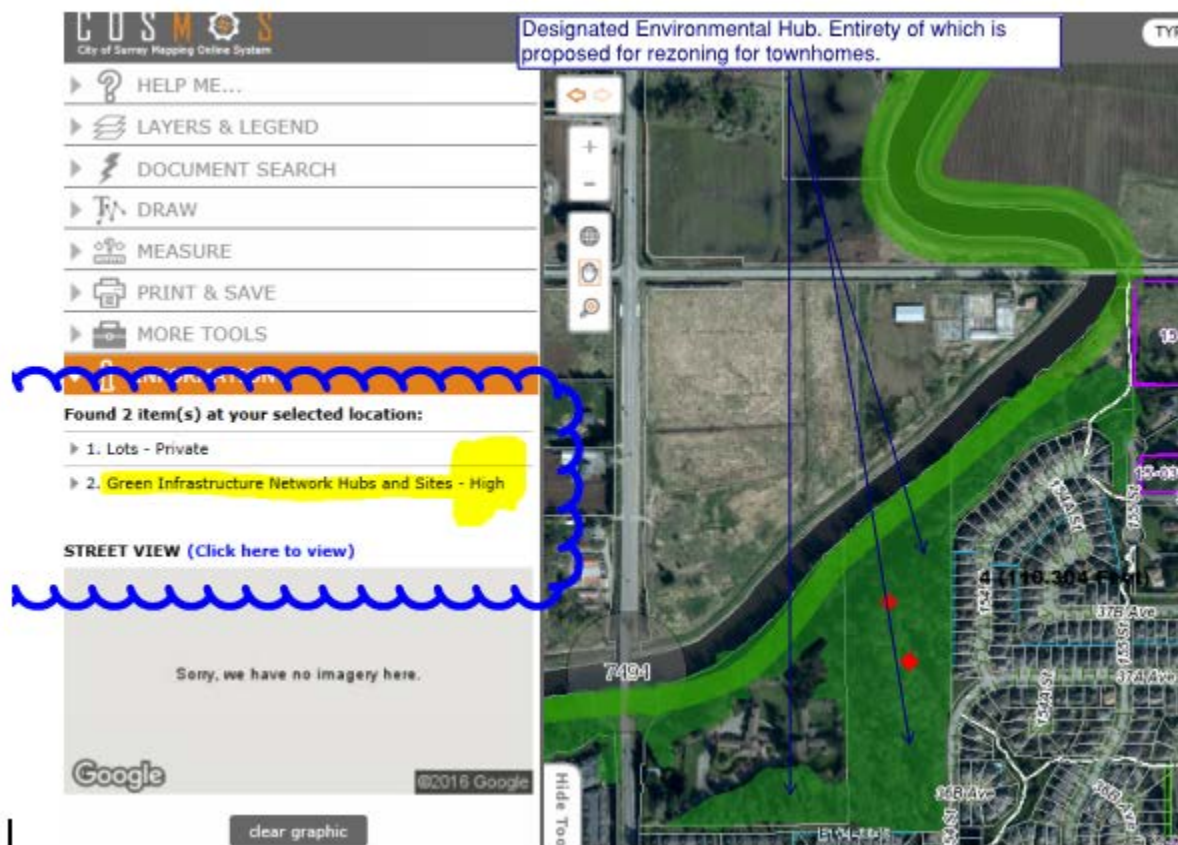
The above study conducted by the City designated the subject lands as being of high ecological value and a crucial component of the hub-to-hub corridors through which animals and wildlife migrate within the Surrey ecosystem.

The City and the Rosemary Heights community (through feedback given at community meetings, forums, and council meetings in relation to the sister proposal in Barbara Creek, and elsewhere) have both identified the protection of sensitive green infrastructure hubs (large habitat areas) and sites (smaller habitat areas) as critical to preserving these dwindling natural habitat refuges, and thereby the unique character of the surrounding area.

The City's own ecological research has pointed out that preserving a diversity of habitat features while maintaining/enhancing corridors is necessary to ensure connectivity between fragmented hubs, and for maintaining genetic variation and the health of animal populations throughout the City.

The City's own environmental reports have pointed out that the treed canopy on the slope and floodplain plays an important role in the ecological functioning of the site and Biodiversity Conservation Strategy (BCS) corridor by providing debris, foliage and shading to the river, floodplain and the hillside slope.

Given that the City of Surrey Biodiversity Conservation Strategy has designated the subject lands as "high value", ecologically sensitive and integral for preservation of the City's ecological diversity and wildlife corridors, the community is concerned that the proposed townhouse development, which contemplates removal of ~95% of the upland forest and intrusion upon the riparian slope, is not in keeping with the City of Surrey Biodiversity Conservation Strategy and Green Infrastructure Network Plans.



### 3.2.3. Surrey Tree Canopy

[http://www.urbansystems.ca/wp-content/uploads/2015/01/SurreyTreeCanopy\\_01\\_13\\_2015.pdf](http://www.urbansystems.ca/wp-content/uploads/2015/01/SurreyTreeCanopy_01_13_2015.pdf)

A recent study conducted by Urban Systems showed that between 2001 and 2013 Surrey has lost more than 5% of its tree canopy due to development. Once a forest has

been cut down it is almost impossible to restore it to its former glory. Trees play an important role in the community by providing a number of benefits. Environmentally, forests purify the air, provide a natural habitat for animals, and mitigate climate change by cooling the surrounding area. The psychological and health benefits of trees have been well researched, along with the economic benefits of having trees in a community. A change in green space can have an effect on the surrounding land value by as much as 20%.

Successful urban planning has increasingly come to recognize the importance of preserving ecologically sensitive green spaces. These lands, with their extensive 2nd growth canopy and riparian location, merit preservation under Surrey's Conservation Strategy, and yet the proposed development makes no effort to incorporate tree and forest preservation into its design, proposing to remove 95% of the forested area.

#### **3.2.4. Slope Stability & Geotechnical Issues**

Recently, four homes further down 154th Street (backing onto the existing City green space at the top of the Nicomekl bluff) settled down the slope enough that they've had their sanitary connections pull away from the City service. Their basements flooded with sanitary discharge and they had to excavate and install new connections to the City mains. This slope is steep, and this level of activity, both long term and during construction will most definitely impact that slope and the adjoining properties. The clay composition of the soil on the land poses a high risk of impacting adjacent structures and properties during construction activity.

#### **3.2.5. Trees & Wind Protection**

In the most recent storm (2017MAY23) the trees in the proposed development were significantly stressed; this is not a rare event. The proposed removal of the existing forested canopy will only further stress the trees left behind to handle the wind load on their own, unshielded. This will cause significant risk to the properties backing onto the proposed development and presents a significant liability.

#### **3.2.6. Surrey Blue Dot Movement**

[https://www.surrey.ca/bylawsandcouncillibrary/CR\\_2016-R010.pdf](https://www.surrey.ca/bylawsandcouncillibrary/CR_2016-R010.pdf)

<http://bluedot.ca/the-plan/>



The "Blue Dot" movement is a grassroots effort across Canada that ultimately aims to amend the Canadian Charter of Rights and Freedoms to include the right to a healthy environment.

On January 11, 2016 the city of Surrey approved the declaration "Right to a Healthy Environment" which includes:

- Breathing clean air, drinking clean water, consuming safe food;
- Accessing nature;
- Knowing about pollutants released into the local environment; and
- Participating in government decisions that will affect the environment.

### **Proposed Approach for City of Surrey**

The goals of the Blue Dot movement and the municipal Declaration represent very basic human rights to clean air, water and food and access to nature. These are important issues that are protected in Canada by federal and provincial legislation, and supported by the work of local governments including through the protection of riparian areas, reduction of greenhouse gas emissions (including from transportation), creation of parks and green spaces, and support of local food growing and healthy eating.

The principles of the Declaration are aligned with those of the Surrey Sustainability Charter, the Official Community Plan, and the Biodiversity Conservation Strategy (BCS). The Sustainability Charter vision includes that "Surrey values and protects its natural environment through stewardship of its rich tree canopy, and enhancement of its natural areas and biodiversity". Access to nature, safe food, clean air and clean water are all embodied in Sustainability Charter goals and actions across all three pillars of sustainability, including the Environmental Goal to "demonstrate good stewardship of the land, water, air and built environment, protecting, preserving, and enhancing Surrey's natural areas and ecosystems for current and future generations while making nature accessible for all to enjoy". Specific goals also exist for protecting terrestrial and aquatic habitat, preserving air quality, reducing consumption and waste, and promoting food self-sufficiency. Action items relating to air and water quality state that the City will advocate for sound practices to monitor and report on water and air quality, minimize air emissions, and encourage waste reduction.

Further, many ideas from the Declaration can also be found in the BCS, which recognizes that preserving nature (including plants, wildlife, and ecological values

and functions) provides many benefits such as clean air and water, improved health and livability, and recreational values. The BCS was developed as a shared vision for conservation and is designed to facilitate cooperation amongst citizens and leaders of the public and private sector. It acknowledges biodiversity as a foundation for a healthy, livable, sustainable, and resilient community and offers a clear and operable strategy to preserve the natural environment while accommodating urban growth objectives.

It is the community association's hope that council will recognize this declaration and act to preserve our neighborhoods from environmental degradation through over development.

### **3.2.7. Neighborhood Concept Plan (NCP): Ecological Aspects**

<http://www.surrey.ca/files/RosemaryHeightsCentralNCP.pdf>

The Community Association notes that the NCP was the result of extensive community consultation and dialogue, and resulted in the creation of a community with a unique ecological character and balance. We note that our NCP, and the process that created it, is widely regarded as a successful model for emulation, and as having achieved a high degree of livability, as evidenced by the in-migration to our community and surrounding areas. The NCP contains a carefully considered balance between different forms of land use and densities, and a carefully considered ring-road system designed around the designation of the subject lands as Institutional.

However, perhaps its greatest success is its focus on retention of ecological features such as forested areas and tree stands within the suburban community, and its retention of sight-lines onto the adjacent forest and riparian wildlife of the Retreat Centre Lands. Residents in the community purchased their properties on the basis of the NCP and with the understanding that, as a largely completed neighbourhood, the ecological integrity of the community--a core feature of its livability--would be respected and protected.





Deer crossing signs remain on 154<sup>th</sup> Street on the eastern edge of the proposed development. Seen here in the shadow of the DP sign.

The lands are home to populations of deer, eagles, coyotes, owls and other fauna that are regularly spotted in the neighbourhood. Rabbits, mice and other rodents support the local raptor population. Flocks of small and large birds regularly transit the corridor.

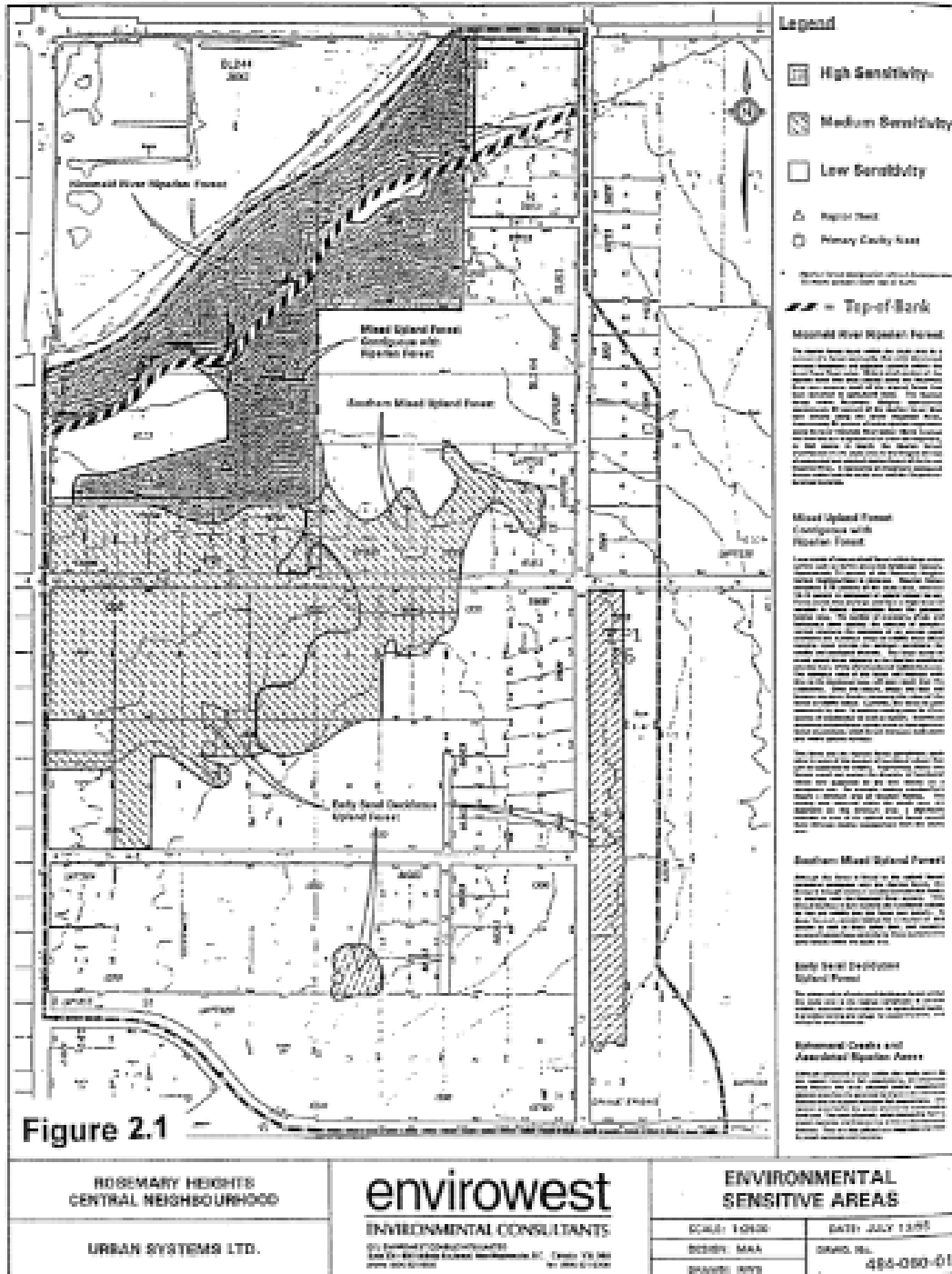
Adopted in 1996, the Rosemary Heights Neighborhood Concept Plan described with remarkable certainty, how the Rosemary Heights Retreat Centre Lands should be used in light of their ecological sensitivity. Below are several quotes from the NCP referring to the use contemplated for these lands:

- To maintain the existing Retreat Centre Institutional and allow for the development of a high school on lands which have not been identified as having environmental high sensitivity; and
- To use the Retreat Centre as an existing buffer between the Nicomekl River riparian zone and higher density residential uses proposed to the south.
- Any future expansion or renovation of the Retreat Centre site shall not impact the areas identified as having environmental high sensitivity as identified in the environmental assessment of this plan; and
- All areas designated for Institutional use have been declared development permit areas in order to regulate landscaping, siting of buildings, the form and character of buildings and protection of environment.

The broad environmental objectives of the NCP are as follows:

- To protect the environmentally sensitive areas within the neighborhood;
- To maintain the functional capacity of environmentally sensitive areas for fish and wildlife; and
- To preserve and protect the riparian forest along the Nicomekl River.

A detailed environmental assessment published by Envirowest Environmental Consultants (DRWG. No. 484-080-01) identified the retreat center lands as having a high sensitivity. Several Raptor Nests and Primary Cavity Nests were identified on the site:



An environmental assessment was undertaken and identified a significant riparian forest adjacent to the southern banks of the Nicomekl River. This riparian forest is identified in Figures 2.1 and 2.7 and encompasses approximately 11.5 hectares (28.41 acres) of land.

The environmental assessment classified this zone as having high environmental sensitivity. Criteria outlined in the BC Ministry of Environment Lands and Park's "Land Development Guidelines for Protection of Aquatic Habitats" recommend that no development other than walking trails, limited community amenities and some public utilities shall be permitted within high sensitivity riparian zones. In addition to the riparian forest, the environmental assessment identified stands of mixed upland forest contiguous with the riparian forest as having either high or medium environmental sensitivity. Property owners have identified some of these forest areas, primarily in the vicinity of 36th Avenue between the proposed ring roads, as features which should be preserved and incorporated into the open space system.

- High sensitivity areas include the riparian forest of the Nicomekl River and a portion of the mixed upland forest (coniferous and deciduous trees) which is contiguous with the riparian forest;
- Medium sensitivity areas include ephemeral creeks and their associated riparian habitats, mixed upland and early seral deciduous forest within the central and southern portions of the study area. These areas are known to accommodate raptor and active primary cavity nest sites or are used by blacktail deer.

Recommendations By Envirowest were as follows:

Nicomekl River riparian forest areas shall not be developed with uses other than walking trails, limited community amenities and some public utilities, subject to approval by the BC Ministry of Environment. Development is not to occur within that portion of the riparian forest between the natural boundary of the Nicomekl River and the top-of-bank;

Where public open space features are developed in the Nicomekl River riparian forest, and assessment of their impacts shall be undertaken by an accredited professional biologist. Impacts are to be mitigated to the fullest extent possible, with unmitigable impacts offset by compensation works that sustain the functional capacity of the forest for fish and wildlife; and,

Where existing vegetation of the mixed upland forest contiguous with the riparian forest is located within the proposed linear park, it shall be retained as a special feature. Residential development adjacent to these features are encouraged to be clustered in order to retain additional trees in these areas.

The NCP document takes this even further to describe development on or near the sensitive area:

There is to be no development from the natural boundary of the Nicomekl River to the top-of-bank. Walking trails, limited community amenities (other than buildings) and some public utilities may be permitted within this area provided they do not significantly impact environmental resources. Development would be subject to approval by the BC Ministry of Environment, Lands and Parks;

- The mixed upland forest contiguous to the riparian forest may accommodate limited development. Development within these areas must sustain the functional capacity of the landscape for fish and wildlife, with special regard for raptors. Where impacts to vegetation occur, these impacts are to be offset by the planting of replacement vegetation to increase the habitat value for fish and/or wildlife;

Approximately 60% of the Retreat Center lands were designated as Institutional use and the NCP document outlines the intended purpose:

A Retreat Centre owned by the Archdiocese of Vancouver currently occupies a property fronting 152nd Street, located in the northern portion of the plan area directly south of the Nicomekl River. The environmental assessment illustrated in Figure 2.1 indicates significant areas on this property contain environmental sensitivity areas comprised of Mixed Upland Forest contiguous with the Nicomekl River riparian forest.

Those parts of the property which are not within the environmentally sensitive areas are generally already developed. The only additional development opportunity is the proposed high school located east of the existing retreat centre. The extent of the developable area is constrained by the environmentally sensitive area including the setback from the top of the bank.

The following objectives apply to the Institutional use:

- To maintain the existing Retreat Centre Institutional and allow for the development of a high school on lands which have not been identified as having environmental high sensitivity; and
- To use the Retreat Centre as an existing buffer between the Nicomekl River riparian zone and higher density residential uses proposed to the *south*.

The following policies and guidelines apply to the areas designated for Institutional use:

- The existing Retreat Centre site proposed for a high school shall be designated for Institutional use;
- Any future expansion or renovation of the Retreat Centre site shall not impact the areas identified as having environmental high sensitivity as identified in the environmental assessment of this plan; and

All areas designated for Institutional use have been declared development permit areas in order to regulate landscaping, siting of buildings, the form and character of buildings and protection of environment.

### **3.2.8. Conclusion / Recommendations**

The Rosemary Heights Community Association supports planned and thoughtful development. The City has endeavoured to do just that (thoughtful master planning), as illustrated by the undertaking of the Rosemary Heights NCP and the Ecosystem Management Study. This said, it only works if we maintain and follow these plans. There are relatively few areas of ecological importance left in Surrey, and when we develop them we don't get them back.

Porte Developments' Retreat Center proposal as it stands should be rejected in full by council, and land designation as outlined by the Rosemary Height NCP needs to remain intact.

Council should also endeavour to use the undeveloped parkland-designated property for its intended purpose. This land is one of the last remaining natural forested habitats in the area; the Rosemary Heights/Morgan Creek area does not have any forested park area and these lands should be preserved for the benefit of all Surrey residents.

### **3.3. Traffic Concerns and Road Safety**

#### **3.3.1. Introduction and Objective**

The purpose of this sub-report is to present and emphasize the rationale, specific only to traffic related issues, for Surrey City Council to deny the re-zoning application and development proposal for the Rosemary Heights Retreat Centre. This sub-report forms part of a larger, comprehensive report that will provide overwhelming evidence that the re-zoning and proposed development will negatively impact and disrupt the existing Rosemary Heights community.

Traffic issues and concerns will be focussed on the following key areas

- Conflict with the NCP Design
- Traffic Safety in the Vicinity of the Proposed Development
- Current Congestion and Related Safety Issues
- Parking

*Note: One of the members of the committee responsible for writing this sub-report is a traffic safety authority and can speak to the road safety facts provided herewith.*

#### **3.3.2. Conflict with the NCP Design**

The intention behind the careful and thoughtful planning of the road systems in the Neighbourhood Concept Plan was to avoid operational and safety problems. The proposed development plan is counter-productive to that effort and will serve only to **create** operational and safety problems. Collector and local roads in the neighbourhood will see heavy congestion that they were never designed to handle, which will spill out into already choked arterial roads. Further, with excessive traffic comes greater risk to public safety. Simply stated, the proposed development plan (and its repercussions) does not align with the Neighbourhood Concept Plan, and arguably worse, demonstrates a careless disregard for it.

#### **3.3.3. Traffic Safety in the Vicinity of the Proposed Development**

As stated, the proposed development will significantly increase vehicle traffic in the Rosemary Heights community, far outside the levels the existing infrastructure was built to support. This raises obvious safety concerns. Increased traffic volumes inherently increase risk to motor vehicle, cyclist and pedestrian safety. This is exacerbated when road systems have not been designed to handle the additional usage.

While the overall area will be more susceptible to traffic safety issues in general, three areas of extreme concern need to be highlighted here. The first two are the two access points to the proposed development site. One is situated on 152nd Street just north of the 36th Avenue intersection, and the other is situated on 154th Street, also north of 36 Avenue. The third area of concern is at the area of 152nd Street and 40th Avenue.

#### **3.3.3.1. Access Point off 152nd Street**

The proposed development plans indicate that southbound vehicles on 152nd would enter the proposed site by way of a left-hand turn approximately 50 meters north of the intersection at 36th Avenue. Northbound vehicles would enter the same access point by way of a right-hand turn. Vehicles would only be permitted to exit the site by a right-hand, northbound turn onto 152nd Street.

As the population in South Surrey has grown significantly in the past several years, 152nd Street has become a major arterial road that is the subject of heavy traffic volume and aggressive driving behaviour. The intersection at 36th Avenue is located at the crest of the hill which grades upward from approximately 40th Avenue.

It is not uncommon for vehicles to be travelling northbound on 152nd Street at speeds in excess of 80 km/hr through the intersection at 36th Avenue (posted speed limit is 50 km/hour). This speed estimation has been provided by a professional traffic authority and is based on his observations over the past six years.

Even in ideal conditions, turning vehicles both in and out of the current Retreat Centre are limited to the line of sight of any approaching northbound vehicle by the cresting hill. However, adding high speeds and inclement weather to the scenario creates already great potential for serious, if not fatal collisions. The addition of approximately 300 more families to the proposed development site would increase this scenario exponentially.

Though the developer may have conducted time-distance analysis studies in this area, the speed they used to calculate the resulting data is conceivably far less than actual speeds consistently witnessed through the intersection. Consequently, any resulting data from these studies should be categorized as unfair and misleading.

It should be noted that the City of Surrey Traffic Engineering Department confirmed that speed monitoring was last conducted at this intersection on January 19, 2014 at 11:00 a.m, for just one hour. The short one-hour duration of the study, conducted over four

years ago, does not accurately reflect the day-to-day reality of the situation and cannot be relied upon for the purposes of this report.

### **3.3.3.2. Access Point off 154th Street and Proximity to Rosemary Heights Elementary School**

The second access point for the proposed development at the Rosemary Heights Retreat Centre is located on 154th Street north of 36 Avenue and just west of Rosemary Heights Elementary School. This street is designated as a “through local” road.

According to the NCP, the roads in the community were designed with traffic calming and safety at front of mind. This holds particularly important for areas around the elementary school where large numbers of small children are present. However, residents have reported an already existing heavy traffic flow and increased levels of speed on 154th Street resulting from traffic routing through the area from 40th Avenue. The intersection at 154th Street and 36th Avenue, a block from which Rosemary Heights Elementary School is located, is also a point of serious concern. The intersection is very active with both parents from the school and commuters from Morgan Creek, Ironwood and Rosemary Heights. It is an uncontrolled intersection and sight lines are very poor, already hindering the safe movement of vehicles through the intersection. With an additional 500 vehicles expected to materialize in the community as a result of the proposed development, and in very close proximity to the elementary school, risk to both child and overall safety is anticipated to increase considerably. Parents in the area of 154, 154A, 155 and 156 Streets south of 37A Avenue, regularly send their children to cross 37A Avenue to play with friends living on the north side and beyond. There is considerable concern that the increased traffic volume will create a risk for children transiting the area.

This portion of 154th Street was not built to accommodate a sharp increase of vehicle traffic on what is essentially a “side street”. Justifiably, safety concerns are extremely elevated in this sensitive area.

### **3.3.3.3. U-Turns in the Area of 40th Avenue**

The configuration of the intersection at 152nd Street and 40th Avenue restricts left-hand turns for both east and westbound traffic on 40th Avenue onto 152nd Street. In order to circumvent the design, vehicles make the forced right-hand turns, proceed a short distance where they then U-turn across the solid yellow line, in order to continue in the direction they wish to travel. The execution of these U-turns is contrary to the Motor Vehicle Act, illegal and unsafe. While some motorists do try to execute the U-turn



safely, many do not. Typically, they apply their brakes suddenly while veering to the side of the road in order to create a larger turning radius, move back into the lane cutting off traffic approaching from behind, and U-turn into oncoming traffic, causing those vehicles to also brake abruptly. This is not a unique scenario; currently it occurs several times over the course of even just one hour and poses a serious safety concern.

As stated earlier, the development proposal calls for one of only two access points to be situated on 152nd Street just north of 36th Avenue. Vehicles exiting the development would only be permitted to make a northbound turn onto 152nd Avenue, southbound turns would be prohibited. Naturally, this design significantly increases the “necessity” for those wishing to travel southbound to make dangerous U-turns, and by extension, significantly increasing the safety risk.

#### **3.3.3.4. Speed Bumps Along 36th Avenue**

In addition to the three areas highlighted above, another point bears mentioning. Recently, the Rosemary Heights Elementary School community initiated a request for speed bump installation along 36th Avenue between 152nd and 154th Streets. As part of the City’s traffic calming evaluation process, the 85th percentile speed on 36 Avenue (measured in January 2016) was recorded at 64 km/hr. In recognizing the already aggressive and dangerous driving habits in the area, the City of Surrey approved that request in order to mitigate safety concerns. With that acknowledgement on record, any action taken to approve the re-zoning (which would lead to the introduction of approximately 500 additional vehicles directly to the area) would be counter-active to the City’s commendable efforts to make 36th Avenue safer.

#### **3.3.4. Current Congestion and Related Safety Issues**

Of significant importance is the fact that the surrounding region has been inundated with development in recent years and the traffic volume resulting from the rapid growth, without the infrastructure to support it, has already reached the point of over-saturation. Additional development projects are already underway which will only add to the gridlock. Harvard Gardens at 32nd Avenue and 152nd Street, Old School at 152nd and 28th Avenue and the business park on 152nd Street just south of 32nd Avenue alone will increase the number of vehicles in the area exponentially once they have reached completion. Additional impacts can be expected from the developments on the West side of 152<sup>nd</sup> Street near Save-On Foods, condos proposed for the King George corridor, and condos currently under construction near Panorama Village, to say nothing of the growth and traffic emanating from 32<sup>nd</sup> Avenue and Grandview Heights developments. Not only does this create considerable safety risks, it also increases

commuter delays. At present, even simple grocery or sports-related trips have increased extraordinarily. For example, a trip to the South Surrey Athletic Park to take children to soccer now exceeds 15 minutes in the after-school hours, traffic is regularly backed up over the Nicomekl bridge on 152<sup>nd</sup> Street and extensively along 32<sup>nd</sup> Avenue, and residential owner frustration is rapidly mounting. A trip to Save-On Foods for a quick grocery-item has become a headache during the rush hour and even weekend traffic is congested. Croydon Drive, too, is regularly obstructed near 32<sup>nd</sup> Avenue. The area can simply not withstand any further increases in traffic volume resulting from development. Residents are asking simply for development to occur in conjunction with the required traffic infrastructure so that the livability of the region is not further degraded.

On any given day, during and even outside peak hours, the following congested traffic areas are at high risk for safety:

#### **3.3.4.1. 152nd Street and 32nd Avenue / Highway 99**

The intersection of 152nd Street and 32nd Avenue sees enormous congestion. Westbound traffic is often backed up to 160th Avenue, and on even heavier days, particularly in inclement weather, it can stretch as far back as 176th Street. Eastbound traffic is regularly backed up through the interchange, through the exit ramp from Highway 99, and even spilling out onto the highway itself. This congestion creates scenarios for:

- excessive delays,
- blocked intersections, which not only impede regular traffic flow, but also emergency vehicle access,
- road rage,
- collisions.

Vehicle congestion on Highway 99 is of particular concern for southbound traffic, travelling at minimums of 100 km/hr, that happen upon sudden and unexpected stoppages in traffic as vehicles line up on the highway shoulder to enter the off-ramp. This is setting the stage for tragic consequences.

Multiple inquiries to the provincial government have confirmed that there is no funding for improvements / expansion to this section of Highway 99 that may have otherwise alleviated the risk. Without the infrastructure required to support the already over-burdened highway and intersection, and with traffic safety at risk, the introduction of another significant volume of traffic through development is fundamentally wrong.

### **3.3.4.2. 32nd Avenue and Croydon Drive**

The intersection at 32nd Avenue and Croydon Drive is another example of excessive traffic build up that generates serious traffic concerns. It is not uncommon to see traffic snaked back to 31st Avenue. The area south of 32nd Avenue is also the subject of extensive business and residential growth which contributes to this congestion, along with vehicles from residential areas north of 32nd continuously funnelling into the congestion area at 152nd and 32nd Avenue.

The majority of the congestion exists for northbound traffic, most of which is intending to make a westbound left-hand turn onto 32nd Avenue at the light. A left-hand turning lane, and an advance turning arrow are absent from this intersection, denoting the insufficient infrastructure in place here as well. As northbound vehicles attempt to make a westbound left-hand turn, impatient vehicles wanting to continue to move north through the intersection continuously pass on the right to avoid delays. Southbound vehicles attempting to make an eastbound left-hand turn are visually obstructed by the westbound left-turners and cannot see those passing on the right.

This further contributes to ‘traffic dodgers’ now bypassing this area through Rosemary Heights and Morgan Creek. Vehicles (including construction vehicles and double trailer dump trucks) re-route to access 152nd Street by detouring to 34th or 36th Avenues, where they add to already mounting congestion and frustration for local area residents. Of note, Blumsen Park, a children's play park, is situated along the bypass route along 34th Avenue.

Again, because this intersection was not designed to accommodate the current volume situation, risk to safety and traffic collisions are imminent.

Additionally, the congestion at the intersection poses risk to the Surrey Firehall #17 exit and response times, with traffic often backing up in front of the hall's exit and response routes to local business and residential areas.

### **3.3.5. Developer's Argument to Re-Route Commuters**

On June 19, 2017, Gary Vlieg, representing Porte Developments, urged Surrey City Council to consider the installation of a traffic light at 40th Avenue and King George Highway to provide easier and safer access to Highway 99. However, this is not a viable solution for the congestion or safety issues in the area. 40th Avenue, between King George Highway and 152nd Street, which would take on all of the diverted traffic,

is a narrow “farm road” with large ditches on both sides that can in no way safely accommodate this enormous influx of traffic. Vlieg also suggested the removal of the medians at 40th Avenue in order to support his plan. These medians are there **because** that portion of 40th Avenue is not designed to handle even medium volumes of traffic. Ironically, it was Vlieg who led the call for the medians while he was employed by the City of Surrey.

The recent car accident and drowning death of a Bellingham mother in the irrigation ditches along King George Blvd demonstrates the risk, folly and potential liability created by this proposal.

### **3.3.6. Parking**

The Neighbourhood Concept Plan indicates that designated street parking in the Rosemary Heights community was specifically designed around safety and operational requirements. Street parking is therefore restricted on many streets to a single side and at present, has already reached maximum capacity. Searching for parking on the street, more times than not, is frustrating and futile. Most spaces are in fact, not utilized by residents of Rosemary Heights – they are taken by owners of adjacent townhome and condominium properties in Solay, Soreno and Edgewater (“Rosemary West”), where it is commonplace to see vehicle owners being ‘picked up’ by other vehicles to bring the driver back to their homes west of 152nd Street. This strains parking for residents on the east side of 152nd further, adding to an already short availability of parking options.

It would be reasonable to state that an influx of approximately 300 additional residences would only serve to worsen the current situation.

### **3.3.7. Traffic Volume Monitoring**

Several ‘traffic monitoring’ studies have been conducted for the area, and were alluded to in discussions with the developer, however these were generated at questionable times, with photo-evidence by several residents showing the studies were conducted outside of the peak afternoon rush hour, on days that were raining, and therefore do not accurately reflect the actual volume data. The most recent traffic volume count reports, dated December 12, 2016, were obtained from the City of Surrey and they confirm that the latest count was captured at 4:45 p.m. on that day. Residents have observed traffic monitors leaving the area before 5:00p.m..

Notably, the community contains a disproportionate number of families who enroll their children in after-school activities in the late-afternoon, early-evening, and the traffic volume is observed to increase after 5:00 pm with parents taking their children to hockey, soccer, piano, the library for tutoring, and other similar activities. The RHCA is concerned that current traffic surveys are not accounting for this unique aspect of our community population, are underestimating the traffic counts and are based on outdated projections of the traffic impact of townhouse development (which is now taken up largely by young families).

### **3.3.8. Conclusion**

Based on the convincing arguments provided above in terms of traffic concerns alone, it is the community's sincere hope that Surrey City Council will see fit to deny the re-zoning application for the Rosemary Heights Retreat Centre. Notably, the traffic concerns are one piece of a very strong overall argument to dismiss the application, including significant and documented environmental concerns, disregard for the NCP and school overcrowding. As the City Council considers all the issues and the negative impacts this proposed development will have on the Rosemary Heights area, the community remains hopeful that Council will act appropriately, and within the wishes of its constituents in this area, and deny the application.

### 3.4. School Concerns

#### 3.4.1. School Already Overcapacity

The Rosemary Heights community has already reached the level that the existing population exceeds the school capacity facilities. Rosemary Heights Elementary has seven portable classrooms and is currently oversubscribed with 540 students with a capacity of 478. The school is densely packed with these portables and the available land area is small with a single playing field. The story is similar at Morgan Creek, with 470 students and a capacity of 406.

A new addition was added to the school and completed last year. Previously it was indicated that some of the portables were going to be moved away to another school to be used elsewhere once our school addition was done. The addition is complete and there is NO plan to move any of the current portables away from the school. The School District has indicated that portables are never moved away from a school when it is anticipated that those portables will be needed in the immediate or near future. Our community is not slowing down with the smaller developments that are already in progress. With new young families moving into these new homes the school population will not be decreasing.

The School District has indicated that our school is currently appropriate and proper for our CURRENT neighbourhood and the CURRENTLY anticipated densification. The District has indicated it might be possible to add two more portables to our school but that because the school grounds are already densely packed it is highly unlikely that any more portables would be added above the current ones **unless we found ourselves in an exceptional or crisis circumstance.**

The massive development proposed on the Rosemary Heights Retreat centre forest would create such a crisis. There is no plan for a new elementary school nearby to handle the approximately 300 homes with new families. Many in the community are outraged that developers push large developments through while the infrastructure and public facilities to support them are not present.

The intentional creation of the crisis is not acceptable to the people living in the Rosemary Heights community as it negatively impacts their children who are attending this school. The degradation of our children's education is not acceptable.

### **3.4.2. Safety of Elementary Students**

Another major concern of the proposed change in land use of the Rosemary Heights Retreat Centre is the danger to children due to additional roads and traffic. The new roads would create traffic that would be within one block of the elementary school. Many children walk along these streets already from the existing homes and townhomes. Speed bumps have been added to portions of this road due to the safety concerns already. Yet the development's main traffic thoroughway would be right on this roadway as people make their way to and from 152nd street. The speed bumps do slow down individuals somewhat as they bump over them and race to the next one. There is also major concern that the cul-de-sac on 36 Ave immediately beside the school would be opened up to accommodate "better traffic flow" through the neighbourhood. The community is opposed to more traffic through the neighbourhood and especially around the elementary school. The ring roadways have been designed to have less traffic flow through the neighbourhood – especially with the school and larger number of children playing and living in the neighbourhood.