

**From:** no-reply@webguidecms.ca <no-reply@webguidecms.ca>

**Sent:** July 7, 2025 12:20 PM

**To:** Elizabeth Tracy <etracy@pemberton.ca>; Corporate <Corporate@pemberton.ca>; Communications <communications@pemberton.ca>; Admin <admin@pemberton.ca>

**Subject:** Website Submission: Write to Mayor & Council - pemberton.ca

Village of Pemberton - Website Submission: Write to Mayor & Council - pemberton.ca

**Website Submission: Write to Mayor & Council - pemberton.ca**

**Form Submission Info**

**First Name:** Natalie

**Last Name:** Livermore

**Street Address:** [REDACTED]

**PO Box:** [REDACTED]

**Town/City:** Pemberton

**Province:** BC

**Postal Code:** V0N 2L0

**Phone Number:** [REDACTED]

**Email:** [REDACTED]

**Please attach any related documents (if applicable):**

**Message to Mayor & Council:** To: Mayor Richman and Members of Council

Village of Pemberton

7400 Prospect Street

Pemberton, BC V0N 2L0

Re: Non-Compliance of Proposed SSMUH Development at 7471 Urdal Road

Dear Mayor and Council,

I am writing to express concern regarding the proposed Small-Scale Multi-Unit Housing (SSMUH) development at 7471 Urdal Road. While presented as modest infill under the Village's SSMUH program, the scale, intensity, and configuration of the project are incompatible with the land use designation, the intent of SSMUH policy, and the surrounding neighbourhood context.

1. Not "Small-Scale" in Any Functional Sense

The current proposal includes:

- Four buildings on the Willow Drive side of the property,
- Each building containing 4 units (totaling 16 residential units),
- Each unit containing 3 bedrooms (for a total of 48 bedrooms),
- And a full floor of structured parking beneath each building.

Additionally, there are plans for three to four more buildings of the same type on the Alder Street side, significantly increasing the overall density and scale of the development.

This is not modest infill—it is a multi-building, high-occupancy residential complex spanning a large portion of the site. While the buildings may comply with height and lot coverage regulations individually, the total occupancy, parking infrastructure, and physical footprint represent a density more appropriate to medium-density zones—not a neighbourhood intended for gradual, low-impact infill.

Dividing the project into multiple buildings does not reduce its effect on the site or the neighbourhood—it simply disperses it in a way that obscures its true scale and cumulative impact.

## 2. Misuse of the SSMUH Policy Intent

The SSMUH program was created to allow gentle, context-sensitive housing growth—not to enable the construction of dense, multi-unit clusters that function like low-rise apartment developments. This project stretches the definition of “small-scale” to its breaking point.

If all 48 bedrooms (or more with the additional buildings) were proposed within a single building, the project would be plainly recognized as high-intensity development, requiring different zoning and approvals. Allowing the same outcome by splitting it across multiple buildings undermines the policy's integrity and creates a dangerous precedent.

## 3. OCP Non-Compliance – “Enhancement of Agricultural” Designation

The property at 7471 Urdal Road is designated “Enhancement of Agricultural” under the Village of Pemberton Official Community Plan (OCP). This designation supports low-impact land use that preserves or enhances agricultural function and character.

This development, with its multi-building layout, dozens of bedrooms, structured parking, and intensive site use, does not align with that vision. It introduces a residential scale and footprint that is fundamentally incompatible with the purpose of this land designation.

## 4. Non-Compliance with Village of Pemberton Zoning Bylaw No. 975

Bylaw 975 defines Small-Scale Multi-Unit Housing as development that is “compatible in form and massing” with the surrounding neighbourhood. The buildings proposed at 7471 Urdal Road are large, uniform, and identical in scale—repeated across multiple lots. This repetitive form and bulk do not blend into the established residential fabric. Rather than achieving modest infill, the project introduces a visual and physical density more aligned with apartment-style development. It lacks the variation and subtlety expected from small-scale housing designed to integrate into a neighbourhood setting.

Further, Section 6.8.3 of Bylaw 975 permits one principal dwelling with up to three accessory dwellings per lot. Section 6.8.4 reinforces that only one principal building is allowed per lot. While

the applicant has proposed one building per lot, each building is subdivided into four equally sized and fully independent dwelling units—none of which function as accessory in size, design, or role. This configuration bypasses the intent of the bylaw by distributing density evenly across all units, instead of establishing one dominant unit supported by smaller secondary ones. These are not accessory in form, character, or scale, and thus do not comply with the intent or letter of the bylaw. Additionally, the proposal raises significant operational concerns regarding parking and snow removal. The volume of units concentrated in these buildings increases demand for off-street parking and winter servicing, which are not adequately addressed by the site layout. In a community with narrow road widths and high seasonal snowfall, these logistical issues become serious barriers to livability and access, and should be fully evaluated before any approval is granted.

#### Request

In light of the above, I respectfully request that Council:

- Not approve the proposed development at 7471 Urdal Road under the current SSMUH policy;
- Require that any proposal of this scale be considered through the appropriate land use channels, including a potential OCP amendment;
- Uphold the intent and purpose of the Village's zoning and OCP policies to ensure consistent, sustainable, and community-supported growth;
- Conduct a site visit to both the Willow Drive and Alder Street sides of the property, including all planning staff and all members of Mayor and Council, to personally observe the proposed access corridors and surrounding existing neighbourhoods before making any decisions on approval.

I support the Village's goal of expanding housing choice and supply, but this must be done in a way that respects planning principles, land use designations, and neighbourhood context. The current proposal does not meet those standards.

Thank you for your time and consideration.

Natalie Livermore

**Freedom of Information:**

Village of Pemberton

**Mayor and Council**  
Village of Pemberton  
7400 Prospect Street  
Pemberton, BC V0N 2L0

Dear Mayor and Council,

**Re: Proposed Multi-Unit Development at 7471 Urdal Road Contravenes the Official Community Plan**

I am writing to express concern that the proposed development of a large number of small-scale multi-unit homes at **7471 Urdal Road** is **not consistent with the Official Community Plan (OCP)**. The proposal stands in direct conflict with several key OCP policies—most notably those outlined in **Section 7.3: Development Permit Area No. 3 – Enhancement of Agriculture**, which aims to minimize impacts on adjacent Agricultural Land Reserve (ALR) lands and preserve the rural character of surrounding neighbourhoods.

The subject site is directly adjacent to ALR on **three sides**, yet the proposed development does not reflect the OCP's direction to minimize impacts on agricultural land or reduce density near ALR boundaries. In fact, the proposed scale appears to disregard section 7.3(g), which calls for a **gradual reduction in density and intensity of new development** as it approaches agricultural areas. If anything, this proposal **increases density** as it transitions from existing neighbourhoods, to ALR. Additionally, **section 7.3.2(i)** discourages linear development patterns through or adjacent to agricultural land—guidance that seems especially relevant given the layout and orientation of the proposed project.

While the **Aspen Fields** neighbourhood does not have a DPA designation, the OCP repeatedly emphasizes the importance of aligning new development with the **character of existing neighbourhoods**. The multi-unit design and overall density of the proposed project are not in keeping with the established single-family form of these neighbourhoods, nor with the rural-residential character that defines much of Pemberton.

Furthermore, the associated **Development Variance Permit (DVP 135)**, which proposes narrowing the road width from 8.5 metres to 6.1 metres, introduces additional challenges. A reduced road standard is not suited to the higher traffic volumes associated with multi-unit developments. If this variance is approved, it should necessarily **limit the scale and intensity** of the project it supports.

**Additional environmental concerns** have also emerged. The **Village of Pemberton recently did not approve the adding of fill on a directly adjacent lot**, after a qualified environmental professional determined the property to be **environmentally sensitive**. This raises serious questions about the appropriateness of adjacent development as there is no discernible change in topography or elevation between the two lots. **Flooding remains a concern**, and while dyking may protect this specific property, it can redirect water downstream or upstream—potentially requiring costly dyking upgrades along the entire **Arn Canal** corridor.

As this development is already being marketed as a "great investment opportunity," we must ask: **do we move forward with development at all costs?** Or can we not take a more balanced approach—one that creates housing while still respecting the OCP's intent and the character of the existing neighbourhood? A **less dense, more context-sensitive development** would be far more appropriate for a site under the "Enhancement of Agriculture" DPA designation.

For these reasons, I respectfully request that:

1. Council recognize that the proposed development does **not align with the OCP** and should not proceed in its current form;
2. The project be reviewed for alignment with the OCP's agricultural interface guidelines and community character policies; and
3. Any approval related to DVP 135 include limits on density in keeping with road capacity and environmental risk.

Thank you for your consideration of these concerns and for your continued commitment to sustainable and thoughtful community planning.

Sincerely,

Name:

Signature:

Address:

Date:

Jasmine Boulanger	[Redacted]	July 22/25
Lyndsey Hultonen	[Redacted]	June 22/25
DOUG BENZIE	[Redacted]	June 22/25
Nabeo Livemore	[Redacted]	June 22/25
Josh Livemore	[Redacted]	June 22/25
Adam Adams	[Redacted]	June 22/25
Tracey Mueller	[Redacted]	June 22/25
Ann Trunkus	[Redacted]	June 22, 2025
Daniel Kaminski	[Redacted]	June 22, 2025
Nancy Lee	[Redacted]	June 22, 2025
Theresa Pallen	[Redacted]	June 22, 2023
Jason Norton	[Redacted]	June 22

ALL ADDRESSES LISTED ARE → Pemberton, BC, VAN 210

Name:

Signature:

Address:

Date:

Luke M4)

DAVID B

Jasmine B

KLAUS GR

Jen McIntosh

Ian McIntosh

JN Bertrand

Lisa Phillips

Sean Woods

CHERYL IBBOTSON

JORDAN IBBOTSON

Charles

MARK GROSTEF

GRACE GROSTEF

JUNE 22/25

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JUNE 22 2025

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June 22/2025

JUNE 22/2025

June 22, 2025



ALL ADDRESSES LISTED → Pemberton, BC  
VON 2LO

Name:

Signature:

**Address:**

Date:

Elizabeth Brynolfson

John Brynolfson

Peter Vandeweyer

Nay Wolfe

June 22/28

June 22/25

June 23, 28

June 25, 25

ALL ADDRESSES LISTED → Pemberton, BC, VON 2LD

Stacey Schapansky

Cori WRAY

July 4/25

July 4/25

# 7.0 Development Permit Guidelines

## 7.3.2 Guidelines

Development and land subdivision shall minimize the potential for negative impacts on lands within the Agricultural Land Reserve.

a) Provide a 15 meter (49 feet) buffer from the non-agricultural land to the boundary of the agriculturally designated land. A restrictive covenant is required to maintain and ensure the continuance of the buffer requirement over time. Any development shall also include a covenant that recognizes that the agricultural use shall be protected, even if they result in nuisances to the new development.

b) Ensure that the landscaping comprising the buffer contains indigenous, low maintenance vegetation and if appropriate incorporate berming and fencing. The BC Agricultural Land Commission publication Landscape Buffer Specifications should be referenced in the design of the landscaped buffer.

c) Non-motorized public trails may be incorporated into part of the buffer provided that they occupy no more than one third of the buffer width, are located away from the edge of the agricultural land and do not reduce the effectiveness and primary purpose of the landscape buffer.

d) Passive open space is encouraged adjacent to agricultural lands.

e) Surface parking or roads abutting agricultural lands require a minimum 7.6 meter (25 feet) wide landscape buffer to separate the paved surface from the agricultural land.

f) Buildings and structures located on adjacent non-agricultural lands should be setback a minimum of 7.6 meters (25 feet) from the edge of the agriculturally designated land. Variances to the setback may be given for: Irregularly shaped lots or site constraints.

An existing natural feature (watercourse, ravine, outcrop, etc) that provides a defendable physical separation on the development parcel.

g) Densities and the intensity of new development proposals should be gradually reduced as they approach agriculturally designated land.

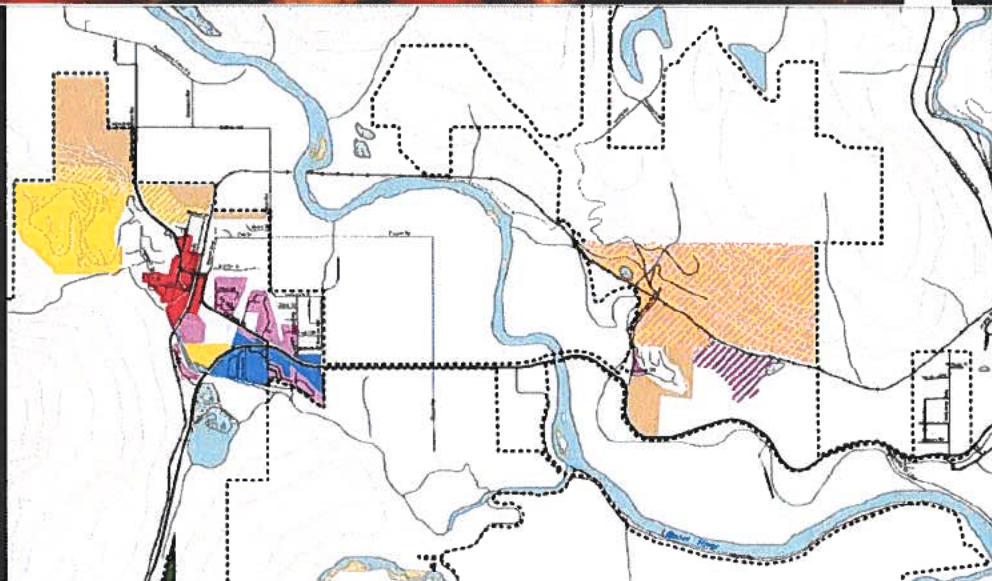
h) Road ends and frontage roads should be avoided next to agricultural lands (except where it is required for farm vehicle access).

i) Discourage, whenever possible, linear developments through the agriculturally designated lands. When unavoidable, ensure that their impacts on the agricultural lands are mitigated.

Village of Pemberton  
Official  
Community Plan

Map C  
Development  
Permit Areas

- Legend**
- Village Boundary
  - Provincial Park
  - Development Permit Areas
    - Enhancement of Agriculture
    - Downtown
    - Intensive Residential
    - Multi-Family/Commercial
    - Gateway
    - Overlap of Residential and Enhancement of Agriculture
    - Overlap of Enhancement of Agriculture, Residential, and Multi-Family/Commercial
    - Overlap of Educational Campus and Enhancement of Agriculture
  - Transportation
    - Highway
    - Arterial Road
    - Local Road
    - Resource Road
    - Proposed Road
    - Railway
  - Hydrography
    - Lake/River
    - Wetland
    - Sand/Gravel Bar
    - River/Stream - Delineate
    - River/Stream - Indefinite
  - Elevation Contour
    - Index Contour (100m)
    - Intermediate Contour (20m)





# p C Development Permit Areas

## Legend

▬ Village Boundary

▬ Provincial Park

## Development Permit Areas

▬ Enhancement of Agriculture

▬ Downtown

▬ Intensive Residential

▬ Multi-Family/Commercial

▬ Gateway

▬ Overlap of Residential

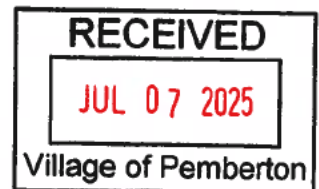
and Enhancement of Agriculture

▬ Overlap of Enhancement of

Agriculture, Residential and



**Mayor and Council**  
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Sincerely,

Name:

Signature:

Address:

Date:

Ashley Rioux  
Kevani Kestel

Marnie Martin

Brenda Martin  
HAYDN KUIPER

Victoria Downes

Gareth Bridgman

Lisa Colburn

KELLY ANN RODNEY

Rob Blue

Heal  
Willa Hrich

June 25/25

June 26/25

June 26/25

June 26/25

June 26/25

June 26/25

June 26/25

June 26/25

JUNE 26/25

JUNE 26/25

June 26/25

June 26/25

Pemberton BC, V0W 2L0

Name:

Signature:

Address:

Date:

~~Azaka Nakajima~~

Angela Blevings

Shannon Stary

Gordon Petrie

Heather Lunn

Nicole MacPhee

Agata Bravington

Ben Bravington-Sim

Tova Renshaw

Petruck Renshaw

Olive Dart

April Thornton

Emma Goodman

Kavin Goodman

June 26/25

June 26/25

June 26/25.

June 26/25

June 26/25

June 27/25

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July 6, 2025



Penuberton BC VOTED

Date:

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JULY 7/25

→ Pembelian BC verrukt