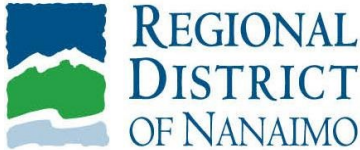


**Attachment 3
Parks and Open Space Advisory Committee Comments**



PLANNING REFERRAL

FILE NO: PL2020-020

DATE: May 5, 2025

FROM: Greg Keller, Senior Planner

TO: Elaine McCulloch, Senior Parks Planner

- | | |
|--|--|
| <input type="checkbox"/> Lexie Boekenkruger, Building Inspection Services | <input type="checkbox"/> Water Service Provider, Attn: Service District Name |
| <input type="checkbox"/> Gerald St. Pierre, Engineering Services | <input type="checkbox"/> Agricultural Land Commission |
| <input checked="" type="checkbox"/> Elaine McCulloch, Parks Services | <input type="checkbox"/> Fisheries & Oceans Canada |
| <input type="checkbox"/> Bylaw Services (<i>for reference only</i>) | <input type="checkbox"/> BC Assessment (<i>for reference only</i>) |
| <input type="checkbox"/> Local Fire Department, Attn: Fire Chief Name | <input type="checkbox"/> RCMP |
| <input type="checkbox"/> Anita Sharma, Fire & Rescue Service Coordinator | <input type="checkbox"/> Island Health,
HPES.Nanaimo@viha.ca ; HPES.Parksville@viha.ca |
| <input type="checkbox"/> Ministry of Forests, Lands, Natural Resource Operations and Rural Development
westcoast.landreferrals@gov.bc.ca | <input type="checkbox"/> Archaeology Branch (archdatarequest@gov.bc.ca),
Attn: Diana Cooper Diana.Cooper@gov.bc.ca |
| <input type="checkbox"/> Ministry of Transportation and Infrastructure,
Attn: District Technician Name | <input type="checkbox"/> Snaw-Naw-As (Nanoose) First Nation,
Chief Gordon Edwards - frontdesk@nanoose.org |
| | <input type="checkbox"/> Qualicum First Nation, Chief Michael Recalma -
recalmag.qualicum@shaw.ca |
| | <input type="checkbox"/> Snuneymuxw (Nanaimo) First Nation,
Chief Michael Wyse - Michael@snuneymuxw.ca |

APPLICATION TYPE:

- | | | |
|--|---|--|
| <input type="checkbox"/> DP | <input type="checkbox"/> OCP | <input type="checkbox"/> ALR Application |
| <input type="checkbox"/> DVP | <input type="checkbox"/> Zoning Amendment | <input checked="" type="checkbox"/> Subdivision |
| <input type="checkbox"/> Amendment to Liquor Licence | <input type="checkbox"/> Temporary Use Permit | <input type="checkbox"/> Cannabis Retail License |

SUBJECT PROPERTY: Lot A, Fowler Road, Electoral Area H

PROPOSAL DESCRIPTION: The applicant proposes to subdivide a 5.39 ha parcel (the subject property) into a seven lot bare land strata subdivision. As the proposed subdivision is creating more than three additional parcels, parkland dedication is required as per Section 510 of the *Local Government Act*. Attached please find the proposed plan of subdivision and a property appraisal.

Under "Regional District of Nanaimo Electoral Area H Official Community Plan Bylaw No. 1335, 2017" (OCP), the Regional District shall determine whether the owner of land being subdivided shall:

- a) Provide, without compensation, useable park land equivalent to 5% of the parcel size and in a location acceptable to the RDN; or
- b) Pay to the Regional District an amount that equals the market value of the land that may be required for park purposes; or
- c) Provide a combination of land and cash to the satisfaction of the Regional Board.

The current subdivision proposal is for 5% of the market value as cash-in-lieu, however, it is at the discretion of the RDN to accept or to require land dedication.

It is the RDN's discretion to accept a proposal for either land or cash-in-lieu. If the RDN agrees to 5% of the land, the applicant would be required to dedicate 2,695 m² in parkland based on the 5.39-hectare parent parcel size. If the RDN agrees to 5% of market value, the applicant would be required to make a cash payment of \$56,500 to the RDN based on the cumulative land value of \$1,130,000 identified by an appraisal completed by Cunningham & Rivard Appraisals Ltd. and dated March 20, 2025.

Please provide your comments on the proposal.

COMMENTS

PARKS AND OPEN SPACE ADVISORY COMMITTEE (POSAC) COMMENTS

POSAC members and parks staff attended a site meeting with the applicant and their representative on May 28, 2025, to review the property as part of the required evaluation process.

During the site meeting and at the POSAC meeting, the applicant requested feedback on whether they should modify their current proposal, which is to provide cash-in-lieu of parkland dedication, to instead offer parkland dedication. The area proposed for dedication is approximately 0.5 hectares in size and is separated from the main portion of the property by an undeveloped road. This potential parkland consists of a narrow strip along the highway frontage, approximately 190 meters long and 27 m wide. The applicant suggested that this strip could provide value by accommodating a future trail loop.

At the May 28, 2025, regular POSAC meeting, the committee reviewed the referral regarding Cash-in-Lieu of Parkland Dedication and the potential revised parkland dedication proposal for Lot A, Fowler Road (PID 032-115-890) and had no further comment.

PARKS STAFF COMMENTS

A review of the preferred park criteria from the *Electoral Area H OCP*, along with the evaluation criteria and concept plan mapping from the *2014 Community Parkland and Trails Strategy (CPTS)*, indicates that the subject property has low potential value as a community park or trail.

In situations where the available land does not meet the minimum size, suitability, or location requirements, cash-in-lieu provides flexibility for future parkland acquisitions, allowing for the purchase of land that is better suited for public use and aligned with community needs.

It is recommended that Cash-in-Lieu of Parkland Dedication for Lot A, Fowler Road (PID 032-115-890) be accepted.

REVIEW

Electoral Area H Official Community Plan (OCP) Review

Section 4.1, Parks and Open Space Policy 11, of the Electoral Area H OCP states that the Regional District may consider accepting parkland during subdivision or rezoning on any land within the Plan Area where there is an opportunity for park dedication to meet one or more of the preferred park criteria (Attachment 4).

The land does not align with any of the preferred park criteria, as summarized below:

- a) The land does not provide access to waterfront lands.
- b) The land is not identified for parkland, trail, or conservation area in the RDN Parks and Trails Strategy (2022), the Community Parks and Trails Strategy (Attachments 3), or the Electoral Area H OCP.
- c) The land does not provide a connection between any existing or future parks or trails and does not offer an opportunity to expand the park system.
- d) The land contains no known sensitive areas beyond the riparian zones, which are already protected by covenant and setbacks. A small park addition would not significantly improve this protection.
- e) The land does not include potential viewpoints or focal features and is not located in an area suitable or desirable for a community gathering space.
- f) Not applicable. The proposal does not include parkland dedication, so the consideration of taking the land as a single contiguous parcel is not required.
- g) The land does not contain any locally significant features or ecosystems that, if preserved or managed, would provide a meaningful net benefit to the community beyond existing protections.
- h) The land is unsuitable for recreational amenities due to its small size (0.27 ha), environmental features, and rural location.
- i) The lands are not identified on Map 3 or Map 2b of the Area H OCP as designated areas for future community and regional parks, trails, corridors, or natural areas.

Community Parks and Trails Strategy (CPTS) Parkland Acquisition Criteria and Concept Plan Review

Section 3.5 of the CPTS outlines criteria for evaluating potential community parkland acquisitions (Attachment 5). The land does not align with these criteria, as summarized below:

General Demographic and Public Values. LOW

The subject property offers limited public benefit when assessed against general demographic and community value criteria. Located in a low-density residential area with minimal nearby population, it is unlikely to serve a significant number of residents. The property lacks distinctive natural features, ecological attributes, or amenities that would support recreational use, environmental education, or community gathering. The land is 0.27 hectares in size, which meets the minimum 0.2-hectare eligibility threshold for parkland dedication; however, this small area limits its potential to support meaningful recreational use or ecological function. Existing environmental protections—such as setbacks and registered covenants—already safeguard key ecological functions, reducing the added benefit of park designation. The site is not connected to any existing parks or trail networks, further diminishing its utility for public access and recreation.

Neighbourhood Park Values. LOW

The subject property scores low overall for neighbourhood park classification. While the property meets the minimum parkland dedication size threshold of 0.2 hectares — with the required dedication in this case being 0.27 hectares — and features suitable topography for recreational use, it lacks other key attributes necessary for classification as a neighbourhood park. It is located in a low-density area with very few residences within walking distance. The small size also limits its recreation potential, and the site lacks cultural, heritage, educational, or interpretive features. Given these limitations, the property does not meet the criteria for neighbourhood park designation.

Ecological Park Values. LOW

The ecological value of the site is limited. While it contains riparian areas, these are already protected through covenants and designated common property setbacks, and a small park addition would not meaningfully improve their protection. The site lacks notable landscape features such as significant trees or rock formations, and there is no confirmed presence of endangered or protected species. Although there is some local habitat connectivity through nearby rural lands, the site does not contribute significantly to broader wildlife corridor functions. Overall, the property offers low potential for ecological park designation.

Linear Park (Trail Corridor) Values. LOW

The land does not currently offer a viable opportunity for establishing trail connections within or directly adjacent to the property, as it is not linked to existing parks or trail networks. While the Community Parks and Trails (CPT) Strategy identifies a potential community trail corridor along the rail corridor to the north of the subject property, on the north side of Island Highway, no trail connections are planned within or immediately adjacent to the site. An undeveloped road right-of-way bisects the property, which could provide a future opportunity for trail connectivity if broader network development occurs.

Attachments:

1. Location of Subject Property
2. Proposed Plan of Subdivision
3. Excerpt from Community Parks and Trails Strategy, 2014, Concept Plan, Electoral Area H
4. OCP Parkland Suitability Criteria Review -14May2025
5. Community Parkland Evaluation Checklist – 14May2025

ATTACHMENTS

1. Location of Subject Property



3. Excerpt from Community Parks and Trails Strategy, 2014, Concept Plan, Electoral Area H

