

Staff Report to Council

Development Services

FILE: 6635-20-2019-06

DATE: July 12, 2019

Date of Meeting – July 30, 2019

TO: Mayor and Council

FROM: Lisa Grant, Director of Community Services

SUBJECT: Agricultural Land Reserve Non-Adhering Residential Use Application – 13740 Harris Rd

RECOMMENDATION(S): THAT Council:

- A. Forward the Agricultural Land Reserve Non-Adhering Residential Use Application for 13740 Harris Rd to the Agricultural Land Commission with a recommendation of support; OR
- B. Other.

CHIEF ADMINISTRATIVE OFFICER COMMENT/RECOMMENDATION:



PURPOSE

The City has received an application for a non-adhering residential use in the Agricultural Land Reserve (ALR) to retain an existing dwelling for full-time farm employees and to construct a second, new dwelling larger than 500 m².

☐ Information Report

☐ Direction Report

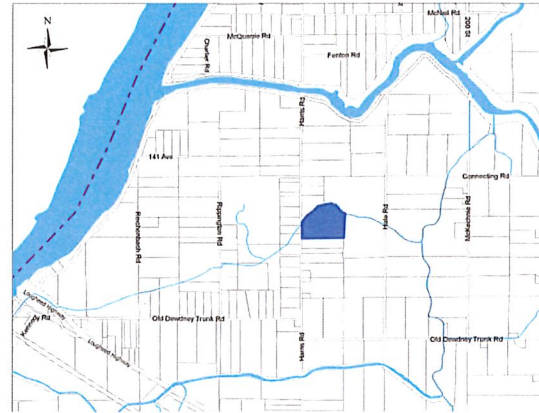
☒ Decision Report

DISCUSSION

Background:

On February 22, 2019, Bill 52 was passed by the Provincial Government and Agricultural Land Commission (ALC) regulations were amended to only permit a single family dwelling of up to 500 m² (5,381 ft²) and to no longer permit a second dwelling, which is why this application has been made.

Applicant/Owner: Kulwinder Parmar
Civic Address: 13740 Harris Rd
Legal Description: Lot 1 Except: Part Subdivided
by Plan 13250; Sec 34 Twsp 9
NWD Plan 7354
Property Size: 12.5 ha (30.98 acres)
Zoning: A-1
OCP Designation: Agricultural



Relevant Policy, Bylaw or Legislation:

Specific policies within the OCP discourage proliferation of large residential estate homes on ALR land including by limiting dwelling size to help ensure the long term viability of the agricultural industry in Pitt Meadows.

The property's A-1 (General Agricultural) zoning permits Agriculture and related uses.

The *Agricultural Land Commission Act* limits properties within the ALR to one dwelling with a maximum floor area of 500 m².

Analysis:

The applicant purchased the property in 2007 and converted it from livestock to blueberry production. The existing dwelling is 317 m² (3,413 ft²) and was constructed in the 1980's. It is presently being used for farm employees and is proposed to be retained. There are also three existing garages on the property ranging in size from 45.5 m² (490 ft²) to 137.1 m² (1476 ft²).

Initially, the applicant intended to apply for a building permit to construct a new, second dwelling for his own family use and retain the existing dwelling for farm help. Preliminary steps were taken in 2009 towards obtaining a building permit such as culvert installation and preloading the site with fill. The building permit application was never completed and a building permit for the single family dwelling was not issued.

According to the applicant, some health issues prevented him from working on the outstanding issues required in order to obtain a building permit for the new house. In 2014, a complete building permit application was submitted. This building permit was not issued as a number of issues remained outstanding. At this time, the City's Zoning Bylaw permitted a 233 m² (2570 ft²) second dwelling for farm help subject to confirmation from an agrologist that the dwelling was necessary for farm help and did not contain a cap on floor size or footprint for the main dwelling.

In 2017, the City updated its Zoning Bylaw regulations to implement a 600 m² residential footprint limit and to require that all second dwellings for farm help receive approval from the ALC through a non-farm use application. However, as a complete building permit application was received in 2014, as noted above, these regulations do not apply in this case.

In 2018, the applicant contacted the City to reactivate the building permit process. While the applicant was working through the outstanding issues, the Provincial Government passed Bill 52, bringing in a new *Agricultural Land Commission Act* and *Agricultural Land Reserve Use Regulation*. This Bill implemented a

maximum floor area limit of 500 m² for a residential dwelling and removed previous provisions for second dwellings necessary for farm help.

Therefore, this application to the ALC has been made for a non-adhering residential use for two purposes:

- (1) Retain existing dwelling for farm help; and
- (2) Construct a new home of 1,094.5 m² (11,781 ft²).

Discussion

Official Community Plan and Zoning

If a second dwelling for farm help is approved by the ALC, part of the existing dwelling will have to be removed or converted into non-residential space as the maximum size permitted for a second dwelling is 233 m² (2570 ft²) in the Zoning Bylaw. A restrictive covenant is also required to be registered on title limiting occupancy of the second dwelling to full-time farm employees and the owner will be required to sign a statutory declaration each year confirming this. Additionally, if approved by the ALC, the proposed new main dwelling is required to be located within 50 m of the existing dwelling.

Staff Comments

In general, Planning staff do not support any activity on agricultural property that removes viable land from agricultural production and increases speculation on other agricultural properties. However, staff does acknowledge that the original proposal was consistent with the regulations at the time the application was received.

Review Process

This application was referred to the City's Agricultural Advisory Committee (AAC) at their meeting on July 11, 2019. The AAC passed the following motion:

"The Agricultural Advisory Committee supports the non-adhering residential use application for 13740 Harris Rd".

A non-adhering residential use application only proceeds to the Agricultural Land Commission for review if it receives approval from the local government to be forwarded, in the form of an authorizing resolution. Council has the option of:

- Not forwarding the application to the ALC; OR
- Forwarding the application to the ALC with a recommendation of support; OR
- Forwarding the application to the ALC with no comment; OR
- Forwarding the application to the ALC with a recommendation of no support.

If an application is forwarded to the ALC, the ALC will consider the local governments input but ultimately any decision is made by the ALC. Conversely, if Council does not resolve to forward an application to the ALC, then the application does not proceed any further. There is no appeal process to the ALC that an applicant can make in that case.

Conclusion

This application is presented to Council with the following options for consideration on whether or not to forward this application to the ALC or not:

- A. Forward the Agricultural Land Reserve Non-Adhering Residential Use Application for 13740 Harris Rd to the Agricultural Land Commission with a recommendation of support; OR
- B. Forward the Agricultural Land Reserve Non-Adhering Residential Use Application for 13740 Harris Rd to the Agricultural Land Commission with a recommendation of no support; OR
- C. Forward the Agricultural Land Reserve Non-Adhering Residential Use Application for 13740 Harris Rd to the Agricultural Land Commission with no comment; OR
- D. Decline to forward the Agricultural Land Reserve Non-Adhering Residential Use Application for 13740 Harris Rd to the Agricultural Land Commission.

If the non-adhering residential use application is not approved, the property will be permitted to have one single family dwelling with a maximum size of 500 m². This may be achieved by demolishing the existing home and building a new home or by adding on to the existing home. A secondary suite in the dwelling is permitted.

COUNCIL STRATEGIC PLAN ALIGNMENT

- ☐ Corporate Excellence ☒ Economic Prosperity ☐ Community Livability
- ☐ Transportation & Infrastructure ☐ Not Applicable

Support the development of a viable agricultural industry.

FINANCIAL IMPLICATIONS

- ☒ None ☐ Budget Previously Approved
- ☐ Other ☐ Referral to Business Planning
-

PUBLIC PARTICIPATION

- ☒ Inform ☒ Consult ☐ Involve ☐ Collaborate ☐ Empower

Comment(s):

This application was referred to the City's Agricultural Advisory Committee.

KATZIE FIRST NATION CONSIDERATIONS

Referral ☐ Yes ☒ No

SIGN-OFFS

Written by:

Reviewed by:

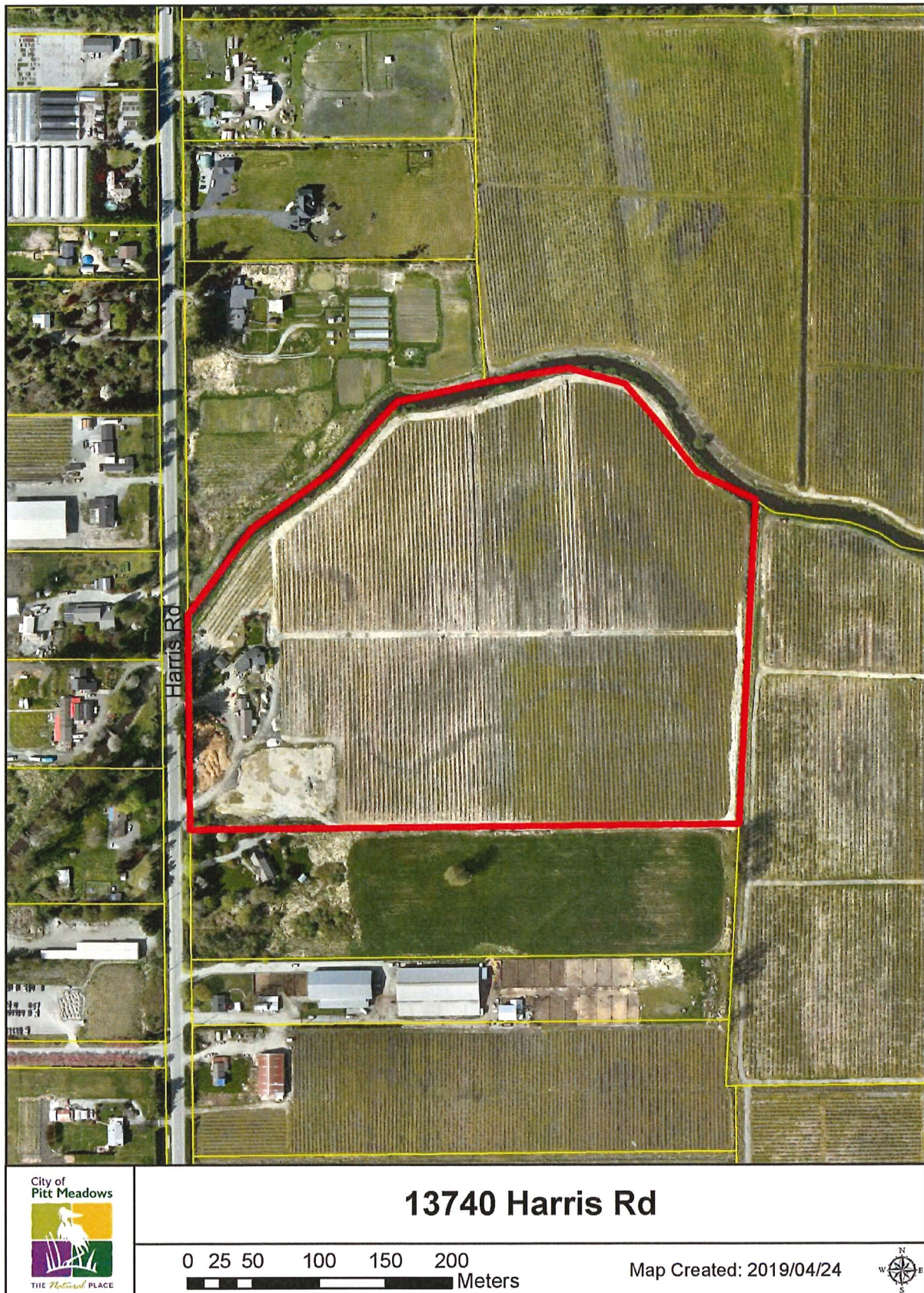
Allison Dominelli,
Development Services Technician

Alex Wallace,
Manager of Community Development

ATTACHMENT(S):

- A. Aerial Photo Map
- B. Neighbourhood Zoning Map
- C. Official Community Plan Map
- D. Site Plan
- E. Application Rationale

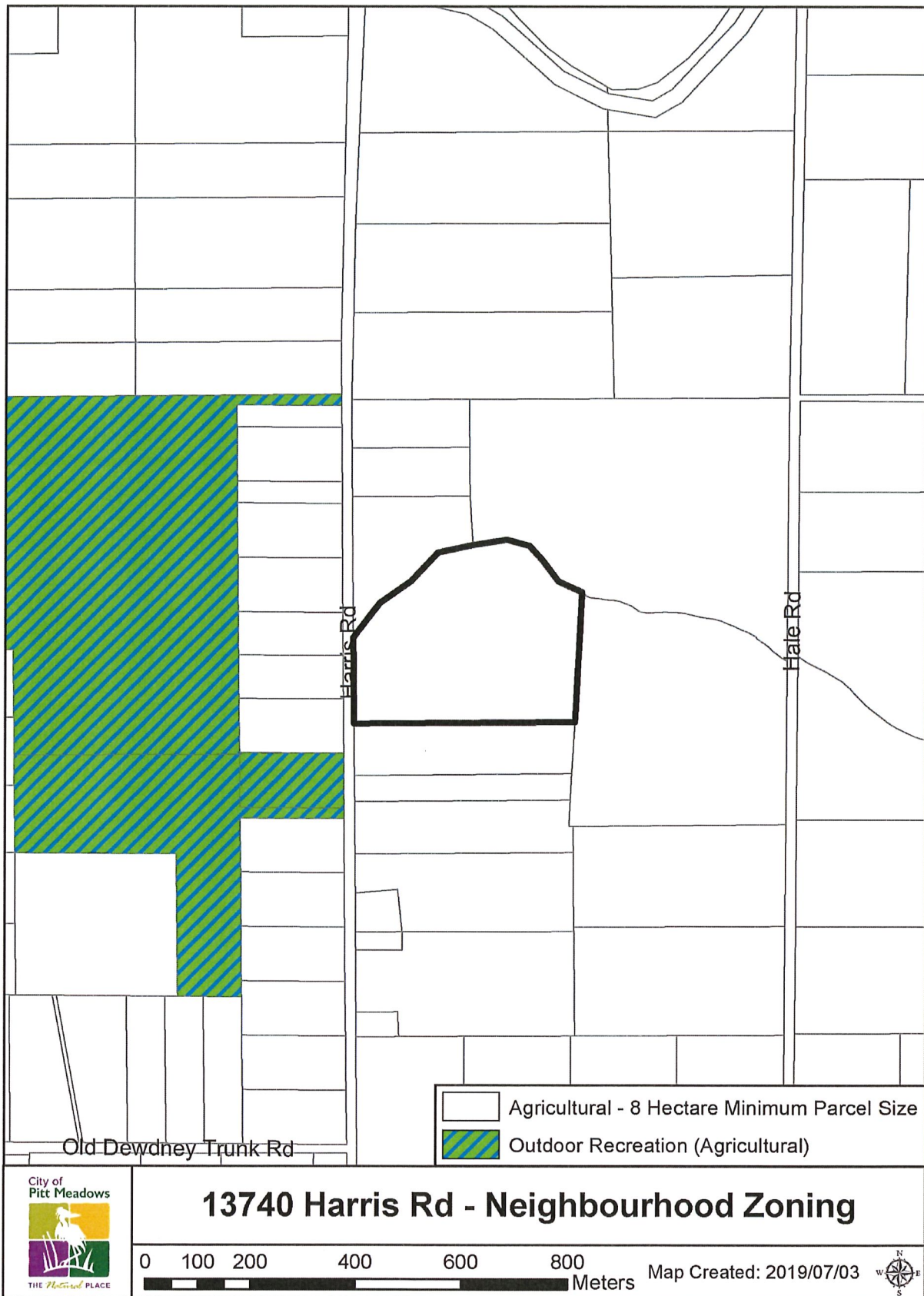
ATTACHMENT A: Aerial Photo Map



ATTACHMENT B: Neighbourhood Zoning Map



ATTACHMENT C: Official Community Plan Map



TOPOGRAPHICAL PLAN OF PART OF LOT 1, EXCEPT: PART
SUBDIVIDED BY PLAN 13250,
SECTION 34, TOWNSHIP 9,
NEW WESTMINSTER DISTRICT, PLAN 7354

SCALE: 1:300

All distances are in metres

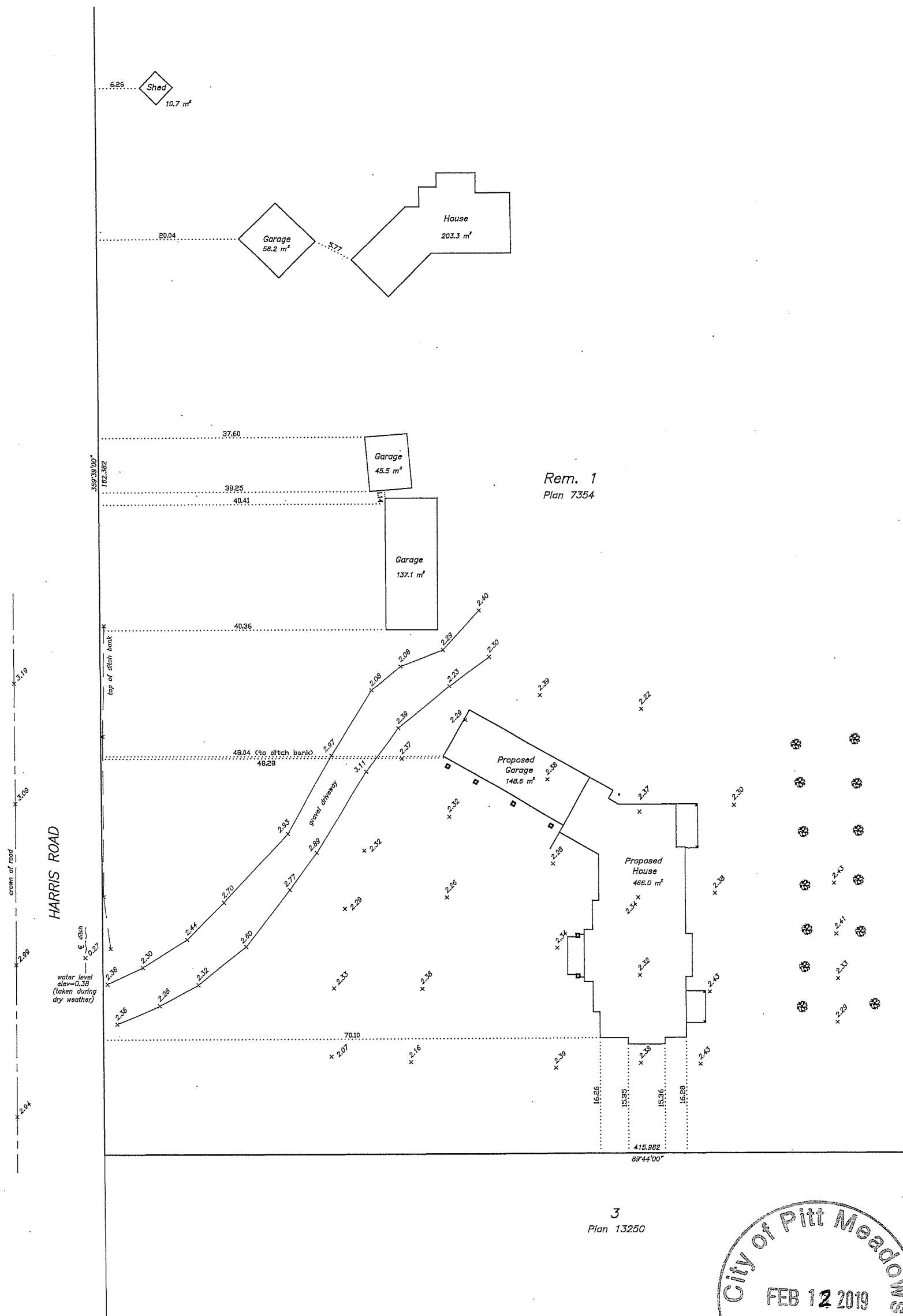
PARCEL IDENTIFIER 011-235-989
CIVIC ADDRESS 13740 Harris Road
Pitt Meadows, B.C.



ATTACHMENT

D

1



LEGEND:

- x 2.01 Spot Elevation
- ⊗ Fruit Tree

NOTES:

Elevations are Geodetic,
shown in metres, derived from
Control Monument 02H2408
Elevation = 6.115 metres
Datum: CYD28GVRD, 2005.

Lot dimensions are based
on LTO records.

This plan was prepared for a specific
purpose and is for the exclusive use of
our client. We assume no responsibility
for the unauthorized use of this plan.

CERTIFIED CORRECT
this 1st day of February, 2019.

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VERNON G. COUDAL & ASSOCIATES,
A DIVISION OF PAPOVE
PROFESSIONAL LAND SURVEYING INC.
202 - 1120 WESTWOOD STREET
COQUITLAM, B.C., V3B 7K2
TEL : (604) 942-8518
FAX : (604) 484-8509
FILE NUMBER : G6229K

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ALR APPLICATION: Non-Adhering Residential Use**13740 HARRIS ROAD, PITT MEADOWS, BC**

A. Purpose of the Application

The purpose of this application is to seek approval from the Agricultural Land Commission (the "ALC") for the construction of a multi-generational farm family residence with a floor area more than 500 m² and to retain the existing residence for farm help.

B. Parcel Under Application

Parcel Identifier: 011-235-969

Lot 1, Except: Part Subdivided by Plan 13250; Section 34, Township 9, New Westminster District, Plan 7354

Civic Address: 13740 Harris Road, Pitt Meadows, BC

Property Size: 12.5 ha (31 acres)

(hereinafter referred to as the "Property")

Property Owners:

Kulwinder Singh Parmar and Manvinder Kaur Parmar

(hereinafter referred to as the "Owners")

Note: The Owners purchased the Property in October 2007

C. Use of the Property

Subsequent to purchasing the Property, the Owners converted the Property from livestock production to blueberry production. Also, the existing residence was repaired through normal maintenance to accommodate a part-time farm worker. The Owners continue to live off-site as a suitable residence to accommodate their multi-generational family has yet to be constructed. The existing residence, while ideal for on-site farm worker accommodations, is not conducive the needs of the Owners extended family.

D. The Proposal

The proposal is twofold:

1. To construction a two-story multi-generational farm family residence with a floor area of 960.3 m² (10,337 ft²) with a 134.2 m² (1,445 ft²) attached garage; and
2. To retain the existing residence for full-time farm help.

The location of the proposed building site is identified on Figure 2 of the March 10, 2010 Agricultural Assessment prepared by Madrone Environmental Services Ltd. However, the proposed building site has changed to the extent that it is now closer to Harris Road. The old barn, shown immediately west of the building site outlined in red in Figure 2, has been removed to facilitate moving the originally proposed eastern boundary of the building site further to the west. The Owners made this decision to concentrate the residential area closer to Harris Road thereby maximizing the use of the agriculturally productive area of the Property. The proposed new building site is essentially located within the historical farm infrastructure footprint. Furthermore, the footprint of the proposed dwelling is approximately 464.5 m² (5,000 ft²) and the overall size of the home is achieved by constructing a second floor.

E. Bill 52 – Agricultural Land Commission Amendment Act (2018)

Bill 52 was introduced to the BC Legislative Assembly on First Reading on November 5, 2018 and received Royal Assent on November 27, 2018.

On Dec. 4, 2018 the ALC provided an update on Bill 52 to inform local governments, land owners and the general public. In its update, the ALC advised as follows:

General Summary:

Bill 52 has received Royal Assent but will not have force and effect until new ALR Regulations are adopted. The Provincial Government is currently working on these ALR Regulations. The ALC anticipates that they will be adopted next year.

Housing Questions:

If your proposed primary house is more than 500m² (5,382 sq ft), the following grandfathering provisions may apply:

Primary Residence:

To have a primary residence (1st house) larger than 500 m² grandfathered, you must have:

1. Received your building permit before the new ALR Regulations are adopted (if building permits are required where you live); AND
2. Construction of the foundation or alteration is substantially begun by November 5, 2019.

Additional Residence (ie. 2nd House):

To have your additional residence grandfathered, you must have:

1. Received your building permit before the new ALR Regulations are adopted (if building permits are required where you live); AND
2. Construction of the Foundation or alteration is substantially begun before the new ALR Regulations are adopted.

Until new Regulations are adopted, the ALC is not able to confirm if a project will meet the grandfathering conditions. This update is intended only to provide information with respect to the timing of the amendments to the ALC Act.

On February 25, 2019, the ALC issued *Information Bulletin 05 (Residences in the ALR)*. This bulletin was subsequently amended on February 26, 2019 and May 8, 2018. Information Bulletin 05 (As Amended) now provides as follows:

INFORMATION BULLETIN 05

Effective February 22, 2019, the ALCA has been amended and the ALR Use Regulation has been created. Though many concepts contained in the ALCA and its regulations are unchanged from the past, there have been changes to the use of ALR land for residences. All references in this information bulletin to the ALCA and the ALR Use Regulation are as of February 22, 2019, unless otherwise stated.

The following is a summary of key residential changes to the ALCA and the ALR Use Regulation:

- Generally land in the ALR may have no more than one residence per parcel: ALCA, s. 20.1(1)(a), subject to certain grandfathering exceptions (see "Grandfathering Provisions" section). In addition, the Commission may approve an application for an additional residence if necessary for farm use, but the Commission is prohibited from approving an additional residence otherwise: ALCA, s. 25(1.1).
- New size, siting and use requirements apply to residential structures: ALCA, s. 20.1(1)(c).
- The total floor area of a principal residence must be 500 m² or less in order to comply with the ALCA, though a local government may impose a lower size cap under their bylaws: ALCA, ss. 20.1(1)(b), 46. The Commission has resolved on a definition of "total floor area" for the purpose of the ALCA and ALR Use Regulation, as set out in the "Glossary" section at the end of this bulletin.

- *The ALCA and regulations had previously contained provisions facilitating the construction of additional dwellings for farm help, manufactured homes for immediate family members, accommodation above an existing farm building, or (in parts of the province) a second single family dwelling. These provisions are no longer found in the ALCA and the ALR Use Regulation, though the ALCA provides some grandfathering protection for pre-existing structures of these kinds and the Commission may approve an application for an additional residence if necessary for farm use.*
- *If a landowner wishes in the absence of certain grandfathering exceptions to have a principal residence having a total floor area that is more than 500 m², to have an additional residence, or to use a residential structure in a manner that contravenes the regulations, the landowner may submit an application to the Commission, through the local government, seeking Commission approval: ALCA, ss. 20.1(2), 25. The ALCA calls this type of application an "application for a non-adhering residential use". More information about this type of application is provided later in this bulletin under the heading "Applications for Non-Adhering Residential Use".*

F. Chronology of Events Regarding the Owners' Efforts to Receive a Residential Building Permit from the City of Pitt Meadow (the "City").

The Owners have advised as follows:

- **October 15, 2007** – Certificate of Title No. CA5903968 was entered in the names of the Owners
- **October 2007** the Owners converted the Property from livestock production to blueberry production.
- **March 28, 2008** –Eaton Home Design was retained to prepared house plans.
Cost = \$6,420
- **May 7, 2008** – Davies Geotechnical Inc. was retained as geotechnical engineer to assess the existing soil conditions in the area of the proposed building site fronting Harris Road in the southwest corner of the Property. The geotechnical assessment was necessary to determine preload requirements prior to the commencement of preloading.
Cost = \$4,095
- **May 12, 2008** – Received a permit to install a culvert in the road side ditch to facilitate access to the building site as was required by the City. Culvert installation was done by Falcon Construction.

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Cost = \$19,260

- **August 3, 2008** - Vernon G. Goudal, BC Land Surveyor, was retained to survey the building site.

Cost = \$1,512

- **September 4, 2008** - All required reports were completed by the geotechnical engineer who then issued Schedule B1 (Assurance of Professional Design and Commitment for Field Review) and Schedule B2 (Summary of Design and Field Review Requirements). Surveyor reports were also completed in order to apply for the preload permit. The City issued Preload Permit #RH095 and required an agricultural environmental assessment. In accordance with the City's requirement, Madrone Environmental Services Ltd. was retained to prepare the agricultural assessment. Madrone provided an assessment dated March 10, 2010 which was provided to the City.

Cost = \$2,675

- **April 24, 2010** – A.B. Mikes, Professional Engineering was retained to provide the necessary information to apply to Fraser Health for a sewage system permit.

Cost = \$3,745

- **2010 (Summer)** – Site preparation and preloading commenced.

Cost = \$65,446.55

- **2011/2016** – One of the Owners experienced significant health issues beginning in 2011. The health conditioned worsened in 2014 and was not resolved until the latter part of 2016. This health matter took priority for the family and is the reason for the delay in pursuing the project. With the health issue resolved, the family re-directed its focus back to the planned construction of new dwelling.

- **March 27, 2014** - Surveyor monitored preload settlement gauges.

Cost = \$2,824.50

- **May 2, 2014** – Eaton Home Design created a new building plan as per the City's requirement to reduce the size of the proposed house as the City was not prepared to allow the proposed guest suite. The City's requirement in this regard was a result of applying for a building permit.

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Cost = \$5,000

- **June 5, 2014** – N.K.V Engineering Ltd. was retained to provide the necessary structural engineering to enable the re-issuance schedule Schedule B1 (Assurance of Professional Design and Commitment for Field Review) and Schedule B2 (Summary of Design and Field Review Requirements) and liability insurance for City.

Cost = \$6,420

- **August 27, 2014** – Based on the City's request, Madrone Environmental Services Ltd. conducted a second agrologist report to provide the rationale for full-time farm employee living in a separate dwelling on the Property.

Cost = \$835.72

- **2011/2016** – As noted previously, one of the Owners experienced significant health issues beginning in 2011. The health conditioned worsened in 2014 and was not resolved until the latter part of 2016. This health matter took priority for the family and is the reason for the delay in pursuing the project. With the health issue resolved, the family re-directed its focus back to the planned construction of new dwelling.

- **May 29, 2017** – Subsequent to settlement of the preload, the City required all excess preload to be remove to 2.45 meters in elevation. At the end of blueberry season work commenced.

Cost = \$160,000

- **2018 (1st Quarter)** – Removal of superfluous preload material was completed.

Note: Subsequent to the removal of preload, the City required new update reports from each engineer as the reports already provided were dated.

- **November 19, 2018** – Updated agrologist report prepared by Madrone Environmental Services Ltd.

Cost = \$1,050

- **December 2, 2018** – Updated sewage and dispersal system information for Fraser Health (File: TDAHBS9QFY) prepared by GroundStone WasteWater Services.

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Cost = \$3,675

- **December 3, 2018** – Updated engineering report regarding Schedule B1 (Assurance of Professional Design and Commitment for Field Review) and Schedule B2 (Summary of Design and Field Review Requirements), prepared by N.K.V. Engineering & Consulting Ltd.

Cost = \$4,725

- **December 5, 2018** – Updated geotechnical engineer's report prepared by Davies Geotechnical Inc. for Schedules B1, B2 and proof of insurance.

Cost = \$2,360

- **December 10, 2018** – Updated mechanical and plumbing engineer's report prepared by Voltas Engineering Ltd. for Schedules B1, B2 and proof of insurance.

Cost = \$8,007.30

- **December 10, 2018** – Electrical and fire engineering report prepared by Z.R. Wong, engineer for Schedules B1, B2 and proof of insurance.

Cost = \$3,745

- **January 31, 2019** – Liability insurance purchased as required by the City. Insurance purchased from Tri City Insurance Company.

Cost = \$1,925

- **February 5, 2019** - National Home Warranty purchased in order to get the permit form for Homeowner Protection Office as required by the City.

Cost = \$3,096.25

Total expenditures to date = \$306,817.32

The chronology referenced above clearly establishes the Owners' longstanding intent to construct a new residence on the Property; a residence that was, in size, consistent with City zoning and the prior iteration of the *Agricultural Land Commission Act*. The Owner's intent goes well beyond any planning stage as a considerable amount of money has been expended and groundwork commenced such as establishing a driveway access, preloading

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the building site and removing superfluous preload after settlement to the ground elevation prescribed by the City.

It is also clear that the Owners' actions to date demonstrate a focused intent to construct a residence suitable to their multi-generational family needs; actions that significantly predate the legislative amendments brought about by Bill 52.

As noted previously in Section D, Bill 52 was introduced to the BC Legislative Assembly on First Reading on November 5, 2018 and received Royal Assent on November 27, 2018. Shortly thereafter (December 4, 2018) the ALC sent a notification to inform local governments of the pending legislative changes slated to come into force on February 22, 2019. The Owners, could not have known about Bill 52 prior to its introduction on November 5, 2018 nor were they aware of the proposed legislation throughout the legislative process culminating in Royal Assent on November 27, 2018. At best, the earliest date the Owners could have known about the pending changes would have been sometime after the ALC communicated with local governments on December 4, 2018.

Regardless of when the pending changes became known, the Owners were pursuing the necessary approvals with the City to obtain a building permit well before the proposed legislative changes were contemplated, drafted, introduced to the Legislative Assembly and ultimately approved.

G. Impact of Legislative Change

In general, change in legislation can be impactful from both a positive and negative perspective. We acknowledge government's prerogative to establish new provincial policy through legislation and to amend exiting legislation. This said, government should be aware that any legislative change that takes away, or restricts, something previously permitted brings with it the very real potential to inflict financial hardship on persons who were simply 'following the rules of the day'. Such is the Owners' case.

As note above, this situation is much more than a case of someone stating it was their future intention to do something. In this regard, the simple fact that someone may have thought of constructing a new home may arguably be insufficient to sway lawmakers or those charged with administering the law like the ALC. However, this situation is completely different. The Owners have been engaged with the City over a number of years, considerable financial

investments have been made and physical work has been undertaken. The Owners are now facing significant financial hardship and are left with no other alternative but to submit a non-adhering residential use application pursuant to the *Agricultural Land Commission Act* (as recently amended). With legislative change persons can fall into several categories:

- Persons purchasing ALR land immediately before or after the legislation was amended;
- Persons that owned ALR land and did not contemplate development now affected by the amended legislation;
- Persons that owned ALR land that contemplated development now affected by the amended legislation but took no action to pursue development;
- Persons that owned ALR land that contemplated development now affected by the amended legislation but just commenced inquiries with approval agencies or undertook minor actions to pursue development; or
- Persons that owned ALR land that contemplated development now affected by the amended legislation and engaged approval agencies, made significant financial investment and commenced work in aid of the development.

Admittedly this list is not exhaustive, but it serves the purpose of stressing to decision-makers, in this case the ALC, that it would be judicially inappropriate to lump all persons into one category and treat them similarly. Put another way, it would be unreasonable for an administrative tribunal to dismiss the relevant facts of each scenario and simply default to the 'law has changed' attitude given the vast differences in the scenarios noted above. The potential for financial hardship is very real to the Owners and should not be downplayed; nor are they people who simply 'thought about' doing something. A plan was made, the financial investment was committed to and work commenced.

While implementation of the legislative amendments did not come into effect until February 22, 2019, less than 3 months following Royal Assent, the Owners continued to work in good faith with the City towards issuance of the building permit but there was simply insufficient time to complete the process. However, to put it into the appropriate context, the Owners advise that they were on the cusp of receiving the permit.

H. Working with the City

The Owners advised that they have had a good working relationship with City staff over the years that this project has been ongoing. The Owners recently sat down City staff who we understand are very sympathetic with their predicament, having been caught by the recent legislative changes at the tail end of the building permit approval process. We also understand that the general sentiment of City staff is that this matter could likely have been finalized had the effective date of the legislation been a little longer than the less than 3 months provided by government.

I. Conclusions

1. The applicants have been working on this project for many years and for the majority of this time, the construction of a new residence as proposed, was consistent with the *Agricultural Land Commission Act*.
2. The Owners have work cooperatively with City staff. The Owners provided all the information and undertook all the work requested by the City to date. The chronology provided above shows that the Owners continued to pursue the project in good faith with the City immediately prior to the ALC advising local governments to the pending changes on December 4, 2018.
3. The project is underway.
4. A considerable amount of money has been spent towards what was a legitimate proposal until very recently with the coming into force of the new legislation on February 22, 2019.
5. The Owners are not:
 - Persons who purchased ALR land immediately before or after the legislation was amended;
 - Persons who owned ALR land and did not contemplate development now affected by the amended legislation;
 - Persons who owned ALR land and contemplated development now affected by the amended legislation but took no action to pursue development; or

- Persons that owned ALR land and contemplated development now affected by the amended legislation but just commenced inquiries with approval agencies or undertook minor actions to pursue development.
- 6. The Owners are:
 - Persons that owned ALR land and contemplated development now affected by the amended legislation and engaged approval agencies, made significant financial investment and commenced work in pursuit of the project.
- 7. The Owners will incur substantial financial hardship if they are not permitted to continue with the project that was initiated under the lawful provisions of the prior iteration of the *Agricultural Land Commission Act*.

J. Attachments

The following attachments do not represent all of the Owners' records as they relate to this project. However, these documents provide proof that the project was commenced many years prior to the recent changes to the *Agricultural Land Commission Act*, that the project is ongoing, that considerable effort has been given to the project and that considerable investments have been made.

- Agricultural Assessment, 13740 Harris Road (March 10, 2010)
Prepared by: Madrone Environmental Services Ltd.
- Rationale for full-time employee living in a separate dwelling on the property (August 27, 2014)
Prepared by: Madrone Environmental Services Ltd.
- Rationale for permanent full-time housing for farm employees (November 19, 2018)
Prepared by: Madrone Environmental Services Ltd.
- Geotechnical Report (May 7, 2008)
Prepared by Davies Geotechnical Inc.
- Geotechnical Report (June 5, 2014)
Prepared by Davies Geotechnical Inc.

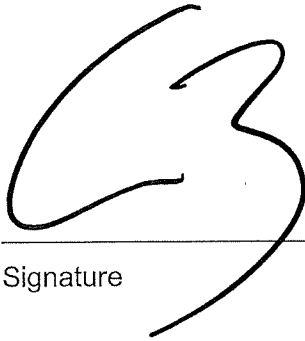
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- Shoring Design Drawings (December 5, 2018)
Prepared by Davies Geotechnical Inc.
- Schedule B-1 (Assurance of Professional Design and Commitment for Field Review)
Schedule B-2 (Summary of Design and Field Review Requirements) – Geotechnical
(May 8, 2008)
Prepared by Davies Geotechnical Inc.
- Schedule B (Assurance of Professional Design and Commitment for Field Review) &
(Summary of Design and Field Review Requirements) – Geotechnical
(June 5, 2014)
Prepared by Davies Geotechnical Inc.
- Schedule B (Assurance of Professional Design and Commitment for Field Review) &
(Summary of Design and Field Review Requirements) – Electrical
(December 10, 2018)
Prepared by Z.R. Wang, Professional Engineer.
- Schedule B (Assurance of Professional Design and Commitment for Field Review) &
(Summary of Design and Field Review Requirements) – Structural
(December 3, 2018)
Prepared by N.K. Varshney, Professional Engineer.
- Schedule B (Assurance of Professional Design and Commitment for Field Review) &
(Summary of Design and Field Review Requirements) – Mechanical &
Plumbing
(December 10, 2018)
Prepared by J.S. Sidhu, Professional Engineer.
- Record of Sewerage System – Fraser Health (April 21, 2008)
- Record of Sewerage System – Fraser Health (December 29, 2018)
- National Home Warranty (February 5, 2019)

- Certificate of Insurance (February 1, 2019)
Prepared By: Tri-City Insurance Brokers Ltd.
- City of Pttt Meadows – Highway Use Permit (September 4, 2009)
- City of Pttt Meadows – Highway Use Permit Renewal (September 1, 2010)
- City of Pttt Meadows – Highway Use Permit (January 28, 2019)
- City of Pttt Meadows – Culvert Permit (May 12, 2008)
- City of Pttt Meadows – Soil Deposit Permit (May 29, 2017)

Date Prepared: June 21, 2019

Prepared By: Colin Fry, President
Colin Fry & Associates Consulting Ltd.



Signature

===== COLIN FRY & ASSOCIATES CONSULTING LTD. =====