

Attachment 4  
*Draft Letter to Metro Vancouver regarding  
the City of Surrey's Metro 2040 Land Use  
Designation Amendment Requests*

## **Attachment 4: Draft Comments to Metro Vancouver on City of Surrey's Proposed RGS Amendments in South Campbell Heights**

December \_\_, 2021

Chair Sav Dhaliwal  
Metro Vancouver Regional District  
Metrotower III, 4515 Central Boulevard  
Burnaby, BC, V5H 0C6

Dear Chair Dhaliwal and the Metro Vancouver Regional District Board,

The City of New Westminster Council received three referrals from Metro Vancouver in relation to the City of Surrey's proposed amendments to the Regional Growth Strategy (RGS). At their regular meeting on December 13, 2021, Council made the following resolution:

**THAT** Council direct staff to send the attached letter to Metro Vancouver as City comment on Surrey's proposed amendments to the Regional Growth Strategy land use designations for properties in the South Campbell Heights area.

The City has no objections to Surrey's requests to amend Metro 2040 to facilitate the development of the new Cloverdale Hospital and Cancer Centre or to enable the development of medium-density residential and commercial uses and an assisted living facility in the Douglas area. However, the City appreciates the opportunity to offer comment in relation to the proposed amendment pertaining to the South Campbell Heights area.

We appreciate that the South Campbell Heights area was identified in Metro 2040: Shaping Our Future as a Special Study Area. We understand that this reflects the fact that when the plan was adopted in 2011, Surrey already anticipated undertaking planning work, including the potential consideration of land use changes in the area. Some flexibility for changes within Special Study Areas is therefore appropriate.

However, the City of New Westminster is concerned that, on balance, the South Campbell Heights amendments being considered by the regional Board are not in alignment with the goals and policies of Metro 2040. The City has identified even greater misalignment between the South Campbell Heights RGS amendment proposal and the draft updated RGS, which more prominently features climate action and resilience than the current plan.

It is challenging to draw hard lines against incremental expansion of urban land uses such as business parks. However, the Urban Containment Boundary is a critical tool for achieving our regional goals of climate protection and growth containment. Given the recognized capacity to accommodate jobs and housing within the existing urban areas

of our region and the severity of the climate crisis, the bar for moving that boundary, even within a Special Study Area, needs to be very high.

In the case of South Campbell Heights, we respectfully suggest that the case for additional Mixed Employment lands is not strong enough to justify expanding the Urban Containment Boundary.

We reached this conclusion by considering:

- the climate implications of a significant net increase in urban lands and a net loss of non-urban lands – despite the proposed increase in Conservation and Recreation lands. Climate impacts include the increase in sprawl given the proposed expansion of employment-generating lands at the edge of the urban area, as well as from the loss of the resilience that non-urban lands provide, such as the protective effects of water filtration, carbon sequestration, etc.; and
- the precedent and likely increase in speculative pressure that a significant intrusion of the Urban Containment Boundary into non-urban areas could create.

Given Surrey's request for designation of these lands to Mixed Employment instead of to Industrial, we do not find that the amendments would necessarily add to the industrial land base of the region. This is particularly the case over the longer term, given the range of non-industrial uses permitted under the RGS designation of Mixed Employment.

We recognize that the City of Surrey has a much deeper understanding of its particular context than any neighbouring municipality, and we hesitate to weigh in on land use decisions being undertaken in another jurisdiction. However, we would suggest that, in the context of the climate emergency, we should encourage each other to share perspectives. This will enable local authorities in Metro Vancouver to continue an open dialogue about the best way to move forward as a region when regional land use changes are being considered. We offer these comments to the Regional District Board in the spirit of collaboration towards climate resilience and a livable region.

Respectfully,

Mayor Jonathan Coté

cc. New Westminster City Council  
Lisa Spitale, Chief Administrative Officer  
Emilie K. Adin, Director of Climate Action, Planning and Development