



# City of Richmond

## Report to Development Permit Panel

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**To:** Development Permit Panel

**Date:** August 26, 2020

**From:** Wayne Craig  
Director, Development

**File:** DV 20-896703

**Re:** Application by Dagneault Planning Consultants Ltd. for a Development Variance Permit at 2151, 2511, 2611, 2651 No. 7 Road and PID 001-928-899

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### Staff Recommendation

That a Development Variance Permit be issued which would vary the provisions of Richmond Zoning Bylaw 8500 to:

- a) Reduce the minimum front yard setback for agricultural buildings and structures from 7.5 m to 1.87 m;
- b) Reduce the minimum interior side yard setback for agricultural buildings and structures from 4.5 m to 0.58 m; and
- c) Reduce the minimum lot area from 2.0 ha to 0.34 ha at 2651 No. 7 Road in order to resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road.

This would allow the existing agricultural buildings and structures at 2151, 2511, 2611, 2651 No. 7 Road and PID 001-928-899 on a site zoned "Agriculture (AG1)" to remain and facilitate a proposed subdivision.



Wayne Craig  
Director, Development  
(604-247-4625)

WC:sds  
Att. 6

## Staff Report

### Origin

Dagneault Planning Consultants Ltd., on behalf of the property owner Mayland Farms Ltd. (Director: Kim May), has applied to the City of Richmond to vary the provisions of Richmond Zoning Bylaw 8500 to:

- a) Reduce the minimum front yard setback for agricultural buildings and structures from 7.5 m to 1.87 m.
- b) Reduce the minimum interior side yard setback for agricultural buildings and structures from 4.5 m to 0.58 m.
- c) Reduce the minimum lot area from 2.0 ha to 0.34 ha at 2651 No. 7 Road in order to resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road.

This would allow the existing agricultural buildings and structures at 2151, 2511, 2611, 2651 No. 7 Road and PID 001-928-899 on a site zoned "Agriculture (AG1)" to remain and facilitate a proposed subdivision. The subject properties are part of an associated subdivision proposal (SD 19-872413/SD 20-891374) to accomplish the following:

- Align the property lines with the existing farm operations by adjusting the existing property lines to follow existing farm access roads and crop boundaries. An air photo map illustrating the proposal is provided in Attachment 1.
- Provide direct road access to each parcel. One of the existing lots currently does not have frontage on No. 7 Road. The proposal would provide a pan-handle to this lot for access to No. 7 Road. Providing the pan-handle would not increase the number of parcels with residential development potential as the proposed subdivision would result in a reduction of the total number of parcels, and the same number of parcels with frontage along a municipal road.
- Resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road. The south property line is proposed to be shifted slightly to the south (approximately 0.8 m), thus reducing the area of the property at 2651 No. 7 Road, also owned by the same property owner. As per the AG1 zone, the minimum lot area is 2.0 ha. In order to resolve the encroachment issue, the minimum lot area of 2651 No. 7 Road is proposed to be varied to 0.34 ha as part of this Development Variance Permit application. The current lot area of 2651 No. 7 Rd is approximately 0.35 ha.
- Transfer the parcels to the next generation of farmers (the property owner's children) as part of farm succession planning and the continuation of the farming operation. The property owner has provided a letter (Attachment 2) indicating the intent to transfer the parcels to the property owner's children.

The proposed subdivision plan is provided in Attachment 3 for reference. The subdivision proposal has been submitted under Section 10 of the ALR General Regulation, which allows the Approving Officer to approve a subdivision without the approval of the Commission, subject to a number of conditions, specifically in this case:

1. Resolves a building encroachment on a property line and creates no additional parcels. *(SD 20-891374 proposes shifting the north property line of 2651 No. 7 Road south by approximately 0.8 m to ensure the existing agricultural buildings and structures do not cross property lines).*
2. Involves not more than four parcels, each of which is a minimum of 1 ha., and results in all of the following:
  - a. No increase in the number of parcels.
  - b. Boundary adjustments that, in the opinion of the Approving Officer, will allow for the enhancement of farming on the owner's agricultural land or for the better use of structures used for farming.
  - c. No parcel in the reserve of less than one hectare.*(SD 19-872413 proposes to subdivide the four existing lots at 2151, 2511, 2611 No. 7 Road & PID 001-928-899 into three lots. The proposed subdivision would reconcile property lines with existing farm operations and reduce the overall number of parcels from four to three. The smallest resulting parcel would be 6.5 hectares in area).*

The Official Community Plan (OCP) land use designation for the subject site is “Agriculture (AGR)”, which comprises of those areas of the City where the principal use is agriculture and food production, but may include other land uses as permitted under the *Agricultural Land Commission Act (ALCA)*. The City’s OCP also contains policies limiting subdivision of agricultural land into smaller parcels, except where possible benefits to agriculture can be demonstrated. The proposed subdivision would result in a reduction of the total number of parcels from four to three, and would not increase the number of parcels with residential development potential. The proposal would comply with the OCP designation and is generally consistent with OCP policy.

The site currently contains an active farming operation (cranberry production) and is classified as farm as per BC Assessment. The site also contains a number of agricultural building and structures in association with the farm operation, which do not comply with the current minimum setbacks in the “Agriculture (AG1)” zone, but are legal non-conforming structures. The purpose of the proposed Development Variance Permit application is to vary the required setbacks and resolve an encroachment issue in order to facilitate the proposed subdivision and allow these agricultural buildings and structures to remain in their current location.

### **Development Information**

Please refer to attached Development Application Data Sheet (Attachment 4) for a comparison of the proposed development data with the relevant Bylaw requirements.

### **Background**

Development surrounding the subject site is as follows:

To the North: Across a City-owned Road Right-of-Way, a railroad and lots zoned “Light Industrial (IL)”.

To the East: Across No. 7 Road, single-family dwellings and agricultural operations on lots zoned “Agriculture (AG1)”, fronting No. 7 Road.

To the South: Single-family dwellings and agricultural operations associated with the subject farming operation on lots zoned “Agriculture (AG1)”.

To the West: Across a City-owned Road Right-of-Way, properties zoned “Light Industrial (IL)” and “Agriculture (AG1)”.

### Staff Comments

The proposed scheme attached to this report has satisfactorily addressed the staff comments identified as part of the review of the subject Development Variance Permit application. In addition, it complies with the intent of the applicable sections of the Official Community Plan (OCP) and is generally in compliance with the “Agriculture (AG1)” zone except for the zoning variances noted below.

### Zoning Compliance/Variations (staff comments in **bold**)

The applicant requests to vary the provisions of Richmond Zoning Bylaw 8500 to:

- a) Reduce the minimum front yard setback for agricultural buildings and structures from 7.5 m to 1.87 m.
- b) Reduce the minimum interior side yard setback for agricultural buildings and structures from 4.5 m to 0.58 m.
- c) Reduce the minimum lot area from 2.0 ha to 0.34 ha at 2651 No. 7 Road in order to resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road.

- ***The subject Development Variance Permit application has been submitted in association with a proposed subdivision (SD 19-872413/SD 20-891374). The purpose of the proposed subdivision is to align the property lines with the existing farm operations and provide direct road access (from No. 7 Road) to each parcel, resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road, and ultimately transfer the parcels to the next generation of farmers as part of the property owner’s farm succession planning.***
- ***In order to facilitate the proposed subdivision, a Development Variance Permit is required to allow the existing agricultural building and structures, which support the existing farm operation, to remain in their current location. The existing agricultural buildings are used as storage for farming equipment and a farm office in support of the existing farm operation.***
- ***Building Approvals staff conducted inspections of the existing agricultural building and structures and have no concerns. The existing agricultural building and structures are considered legal non-conforming.***
- ***The properties are currently farmed for cranberry production and have farm status as per BC Assessment. The applicant has indicated the parcel is part of a large holding that includes 32 parcels (including the surrounding parcels). All parcels are currently part of an intensive farming operation associated with cranberry production. This is not proposed to change, but will allow the continuation of the farming operation by the next generation of farmers.***

- *The applicant has also submitted an Agrologist Report in support of the application (Attachment 5).*
- *The Food Security and Agricultural Advisory Committee (FSAAC) reviewed and supported the subject Development Variance Permit application and proposed subdivision at its meeting held on June 18, 2020. An excerpt from the June 18, 2020 FSAAC meeting minutes is provided in Attachment 6.*
- *The building setback variances would only apply to the existing buildings and structures.*

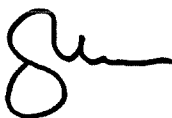
### Conclusions

Dagneault Planning Consultants Ltd., on behalf of Mayland Farms Ltd., has applied to the City of Richmond to vary the provisions of Richmond Zoning Bylaw 8500 to:

- a) Reduce the minimum front yard setback for agricultural buildings and structures from 7.5 m to 1.87 m.
- b) Reduce the minimum interior side yard setback for agricultural buildings and structures from 4.5 m to 0.58 m.
- c) Reduce the minimum lot area from 2.0 ha to 0.34 ha at 2651 No. 7 Road in order to resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road.

This would allow the existing agricultural buildings and structures at 2151, 2511, 2611, 2651 No. 7 Road and PID 001-928-899 on a site zoned "Agriculture (AG1)" to remain and facilitate a proposed subdivision in order to transfer the parcels to the next generation of farmers as part of the property owner's farm succession planning.

As the proposed development would meet applicable policies in the Official Community Plan (OCP), staff recommend that the Development Variance Permit be endorsed, and issuance by Council be recommended.



Steven De Sousa  
Planner 1  
(604-204-8529)

SDS:blg

### Attachments:

- Attachment 1: Aerial Photo
- Attachment 2: Letter from the Property Owner regarding Transfer of Parcels
- Attachment 3: Proposed Subdivision Plan
- Attachment 4: Development Application Data Sheet
- Attachment 5: Agrologist Report
- Attachment 6: Excerpt from the June 18, 2020 FSAAC Meeting Minutes

Proposed subdivision to align property lines with the existing farm operation

Existing property lines

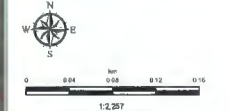
Setback variances requested to allow existing agricultural buildings and structures to remain

Resolve an encroachment issue with the existing agricultural buildings and structures by shifting existing lot line south

Pan-handle to provide direct road access

DV 20-896703

Photo Date: 2020-08-24  
Note:  
The information shown on this map is compiled from various sources and the City makes no warranties, expressed or implied, as to the accuracy or completeness of the information.  
Users are reminded that lot lines and legal descriptions must be checked in the Land Title Office in New Westminster.  
This is NOT a legal document, and is published for information and consultation purposes only.  
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August 25, 2020

City of Richmond  
Urban Development Division  
6911 No. 3 Road  
Richmond, British Columbia  
V6Y 2C1

Dear Sirs:

**RE: PROPOSED SUBDIVISION: 2151, 2511 & 2611 No. 7 ROAD,**

The purpose of this subdivision is to realign several existing lots as part of a succession plan whereby we will divest ourselves of these lands to our children so they can continue to actively farm them.

At this point in our succession planning it is our intent to dispose of the property in the following manner:

Lot A to: Garrett May  
Lot B to: Tyler May  
Lot C to: Tyler May

We trust this provides you with the information you require.

Respectfully submitted,

Mayland Farms  
David & Kim May  
2611 No. 7 Road  
Richmond, BC  
V6V 1R3

**PROPOSED SUBDIVISION PLAN OF:**

- 1) PARCEL A REFERENCE PLAN 86761
- 2) LOTS 1 AND 5 PLAN 69622
- 3) PROPOSED LOT 1 PLAN EPP.....

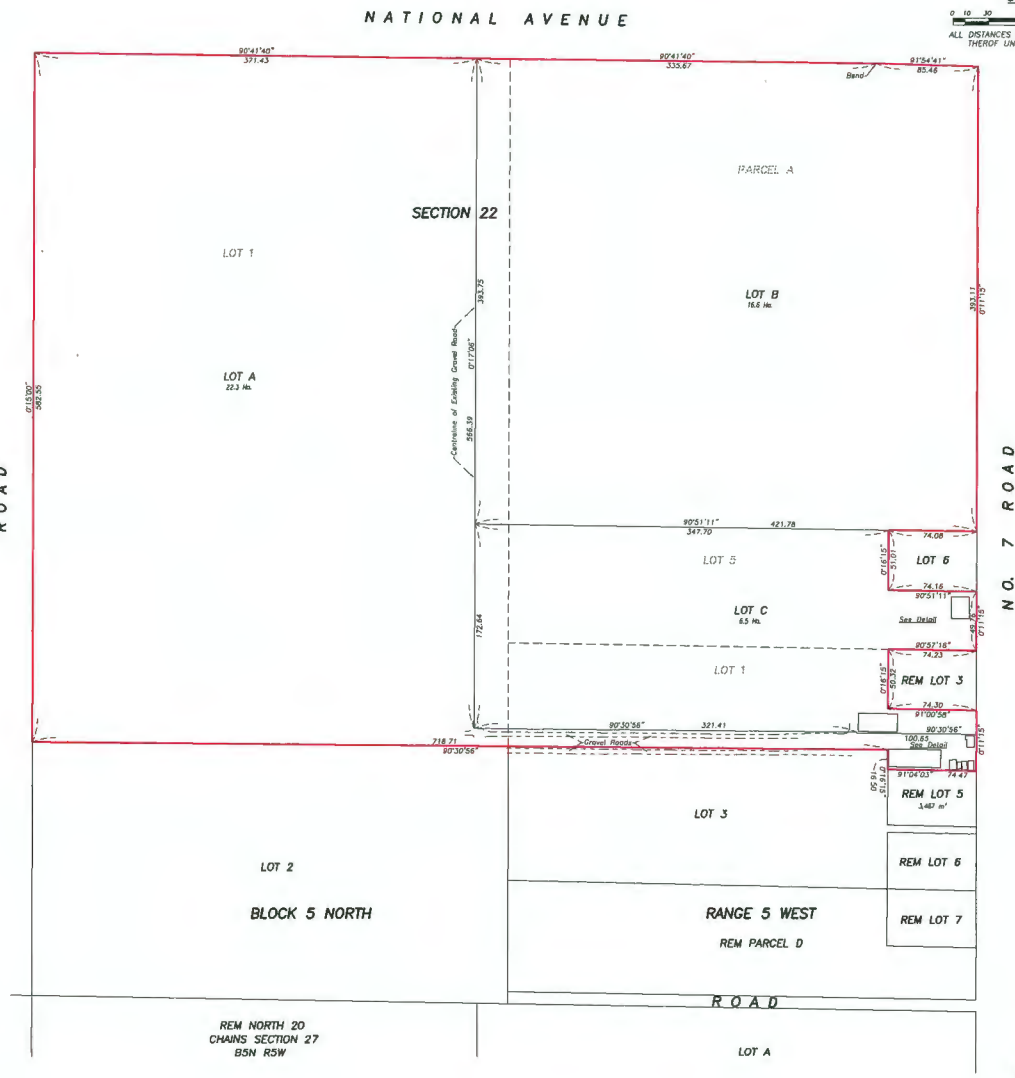
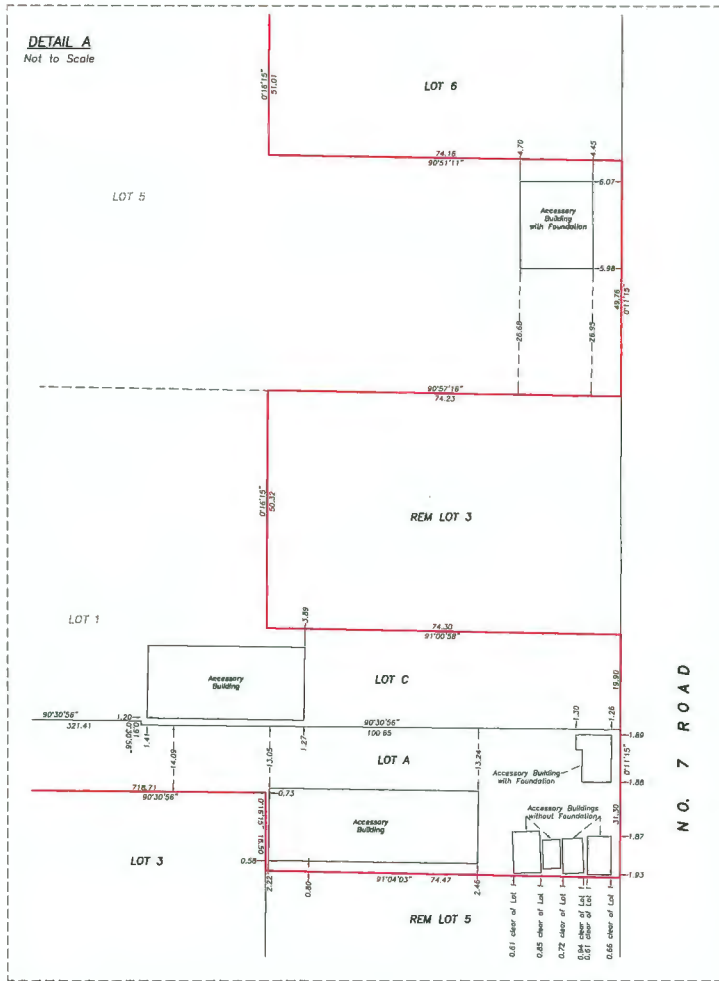
**ALL OF SECTION 22 BLOCK 5 NORTH RANGE 5 WEST NEW WESTMINSTER DISTRICT**



SCALE: 1:2000



ALL DISTANCES ARE IN METRES AND DECIMALS THEREOF UNLESS OTHERWISE INDICATED



J. C. Tam and Associates  
 Coastal and B.C. Land Surveyors  
 115 - 6833 Dale Crescent  
 Richmond, B.C. V6X 3Z7  
 Telephone: (604) 214-8928  
 Fax: (604) 214-8929  
 E-mail: office@jctam.com  
 Website: www.jctam.com  
 Job No: 7377  
 Drawn By: HK/MT

DWG No. 7377-ProSub-06

FB-375 P93-95, 100, 114, 123, & 130  
 FB-390 971

REM NORTH 20  
 CHAINS SECTION 27  
 BSN RSW

Johnso  
 n Tam  
 U814B9

Digitally signed  
 by Johnson  
 Tam U814B9  
 Date:  
 2020.08.25  
 16:21:55 -0700

20th DAY OF AUGUST, 20

ATTACHMENT 3





**DV 20-896703**

**Attachment 4**

Address: 2151, 2511, 2611, 2651 No. 7 Road & PID 001-928-899

Applicant: Dagneault Planning Consultants Ltd. Owner: Mayland Farms Ltd.  
(Director: Kim May)

Planning Area(s): East Richmond

	<b>Existing</b>	<b>Proposed</b>
<b>Site Area:</b>	2151 No. 7 Road: 15.48 ha 2511 No. 7 Road: 3.58 ha 2611 No. 7 Road: 3.11 ha PID 001-928-899: 23.22 ha 2651 No. 7 Road: 0.35 ha	Lot A: 22.3 ha Lot B: 16.6 ha Lot C: 6.5 ha 2651 No. 7 Road: 0.34 ha
<b>Land Uses:</b>	Agriculture	No change
<b>OCP Designation:</b>	Agriculture (AGR)	No change
<b>Zoning:</b>	Agriculture (AG1)	No change

<b>Agricultural Buildings and Structures</b>	<b>Bylaw Requirement</b>	<b>Proposed</b>	<b>Variance</b>
Lot Coverage:	Max. 35%	Complies	None
Setback – Front Yard:	Min. 7.5 m	1.87 m	<b>Variance requested</b>
Setback – Side Yard:	Min. 4.5 m	0.58 m	<b>Variance requested</b>
Lot Area	Min. 2.0 ha	Lot A: 22.3 ha Lot B: 16.6 ha Lot C: 6.5 ha 2651 No. 7 Road: 0.34 ha	<b>Variance requested</b>
Height:	Max. 35.0 m	Complies	None



R.G. (Bob) Holtby, MSc, PAg. Principal

## An Opinion on an Application to Realign Lot Line Boundaries

Client: Mayland Farms Ltd.

Date: May 30, 2019

2533 Copper Ridge Drive, West Kelowna, BC, V4T 2X6,  
Phone: 250-707-4664, Cell: 250-804-1798, email: [bholtby@shaw.ca](mailto:bholtby@shaw.ca)

## 1.0 The Proposal

David May, through his company, Mayland Farms Ltd. (Inc. No. 278084) wishes to realign parcel boundaries to rationalize their location and to allow for a succession plan for his children.

The lots involved are:

1. Lot 1 Section 22 Block 5 North Range 5 West New Westminster District Plan 69622; PID 001-928-899 containing 57.4 acres or 23.23 hectares.
2. Parcel A Section 22 Block 5 North Range 5 West New Westminster District Reference Plan 86761; PID 016-476-611 containing 38.29 acres or 15.49 hectares.
3. Lot 5 Section 22 Block 5 North Range 5 West New Westminster District Plan 69622; PID 001-928-953 containing 8.86 acres or 3.58 hectares.
4. Lot 4 Section 22 Block 5 North Range 5 West New Westminster District Plan 69622; PID 001-928-945 containing 7.7 acres or 3.12 hectares.

The lots are shown in Figure 1:

**Figure 1: Satellite View of Subject Parcels**



The proposed new lot lines are shown in Figure 2. The revisions are:

1. To nudge the western boundary of Lots 2, 3, and 4 to conform to the road currently in the eastern edge of Lot 1.
2. Move the boundary between Lots 3 and 4 to create a panhandle on the new lot to allow access from the No 7 Road to Lot 1. The move of the lot line eliminates one lot.

**Figure 2: Proposed New Lot Lines**



Note: the lot lines through the shop area will be defined in the survey.

The new lot sizes are:

Lot #	Acres	Hectares
1	57.8	23.4
2	42.2	17.1
3	16.9	6.8

Given the nature of the application, it is made under Section 10 (1)(c) of the *Agricultural Land Reserve General Regulation*.

## 2.0 Qualifications

I am a licensed Agrologist and have been a full member of the B.C. Institute of Agrologists since 1971 (except 2001-2002). I am a graduate from the University of British Columbia with a Bachelor of Science degree in 1967, specializing in Agriculture Economics, and a Master of Science degree in 1972, specializing in Farm Management. My thesis for my Master's degree was entitled *Resource Allocation for the Median Peace River Farm in British Columbia*

I have been involved in the work of the Agricultural Land Commission since 1974 when the reserve boundaries were proclaimed. At that time, I was District Agriculturist for the British Columbia Ministry of Agriculture in Prince George. In October 1978 I entered private practice and have provided professional opinions for clients who have sought amendments to the Agricultural Land Reserve boundaries, subdivision within the ALR, or who have needed assistance in compliance with requests from the Commission.

I have also written and spoken of the need to address the unintended consequences of the provincial land use policy.

All agricultural assessments, whether they are for feasibility or management purposes, start with the soils. Past that point one needs an understanding of plant science, animal science and farm management to properly assess the farming potential of any site. I have demonstrated that understanding throughout my career.

During my years in both public and private practice, Courts and Review Boards have accepted me as an expert regarding farming practices in British Columbia. Consequently, I feel qualified to provide an assessment of a proposal under the *Agricultural Land Commission Act*. My qualifications and experience allow me to comment on the value of agricultural land and the practices of farming on that land.

Consequently, I believe I am qualified to comment on the two main purposes of the Agricultural Land Commission. That is: to preserve agricultural land, and to encourage farming on agricultural land in collaboration with other communities of interest.

I have been a member of the Environmental Appeal Board and the Forest Appeals Commission. Following these appointments, I have received training in Administrative Law and the Rules of Natural Justice.

Since the inception of the Application Portal, I have been identified in the application as the “Agent.” The reader should note that I do not act as an agent in the normal use of the term. That is, I have no fiduciary responsibility to the applicant.

Section 3 of the Code of Ethics of the BC Institute of Agrologists includes the paragraph:

- ensure that they provide an objective expert opinion and not an opinion that advocates for their client or employer or a particular partisan position.

Given the complexity of the Portal, it is more expeditious for me to enter the data and forward correspondence than to expect the applicants to learn the procedure for what may be a one time process.

I have requested that the Commission use the term “Consultant” rather than “Agent” as it describes the work performed. Given the refusal to amend the title, I am content in the understanding that I am acting in concert with the requirements of my profession whatever term is used.

### **3.0 Agricultural Capability of the Subject Parcels**

The subject parcels are currently in cranberry production and are expected to continue being farmed by the next generation. Photograph 1 shows the fields from the southern boundary of the new lots 1 and 3.



**Photograph 1: New Lot 1**

#### **4.0 Local Government Concerns**

All existing parcels are zoned AG1. The proposed boundary realignments do not challenge that zoning.

Section 14.1.8 of zoning bylaw 8672 reads:

##### **14.1.8 Subdivision Provisions/Minimum Lot Size**

1. Subdivision of land in the Agricultural Land Reserve shall not be permitted unless approved by the Provincial Agricultural Land Commission. Where the approval of the Provincial Agricultural Land Commission is not required, the minimum lot area shall be 2.0 ha.

As is shown in Section 1, all three new lots will comply with the 2.0 hectare minimum.  
Section 10 of the Agricultural Land Reserve General Regulation

Section 10 (1)(c) of the Regulations reads:

- 10 (1) Despite section 18 (5) of the Act, an approving officer or other person referred to in that provision may approve a subdivision described in that provision without the approval of the commission if the proposed subdivision achieves one or more of the following: ...
  - (c) involves not more than 4 parcels, each of which is a minimum of 1 ha, and results in all of the following:
    - (i) no increase in the number of parcels;
    - (ii) boundary adjustments that, in the opinion of the approving officer, will allow for the enhancement of farming on the owner's agricultural land or for the better use of structures used for farming;

(iii) no parcel in the reserve of less than 1 hectare;

The proposal reduces the number of parcels from 4 to 3. All parcels are larger than 1 hectare.

With respect to sub subsection (ii), the principal benefits of the proposed boundary adjustment are the rationalization of the legal lot lines with the field patterns of the cranberry fields and the improved access to the fields from the farm headquarters. Both attributes enhance the farm.

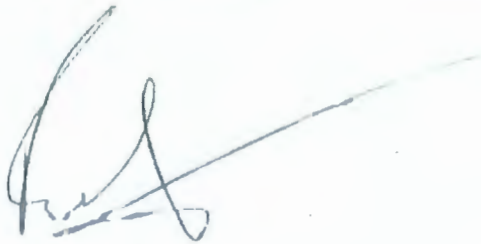
#### **5.0 Summary and Conclusion**

In my opinion, the proposed boundary adjustments fulfill the criteria in Section 10(1)(c) of the regulation.

By rationalizing the boundaries of the farm, the land can be apportioned to Mr. May's children to make the next generation of farmers viable with title and the ability to independently manage the new farms.

I remain available to discuss my findings and opinion on this application.

Respectfully submitted,



R.G. (Bob) Holtby, P.Ag.

May 30, 2019

**Excerpt from the Meeting Minutes of the  
Food Security and Agricultural Advisory Committee (FSAAC)**

**Thursday, June 18, 2020 – 7:00 p.m.  
Rm. M.2.002 (Webex)  
Richmond City Hall**

**Subdivision/Development Variance Permit Application – 2151, 2511, 2611 No. 7  
Road & PID 001-928-899**

Steven De Sousa, Planner 1, introduced the applications and provided the following comments:

- The purpose of the application is to align property lines with the existing farm operations on-site and to provide direct road access to each parcel;
- The properties are currently being farmed for cranberries and have farm status, which is proposed to continue should the applications be approved; and
- A number of applications have been submitted in association with the proposal, including a subdivision application for the overall lot configuration, a subdivision application to resolve building encroachments along the south property line, and a Development Variance Permit application to address setback compliance issues with the existing agricultural buildings.

The property owner noted that these applications are also for farm succession planning and to transfer the parcels to his children to continue farming.

The Committee passed the following motion:

*That the Food Security and Agricultural Advisory Committee support the Subdivision/Development Variance Permit Application at 2151, 2511, 2611 No. 7 Road & PID 001-928-899 (SD 19-872413 /SD 20-891374 /DV 20-896703).*

*Carried Unanimously*





No. DV 20-896703

To the Holder: DAGNEAULT PLANNING CONSULTANTS LTD.

Property Address: 2151, 2511, 2611, 2651 NO. 7 ROAD AND PID 001-928-899

Address: C/O BRIAN DAGNEAULT  
220 - 8171 COOK ROAD  
RICHMOND, BC V6Y 3T8

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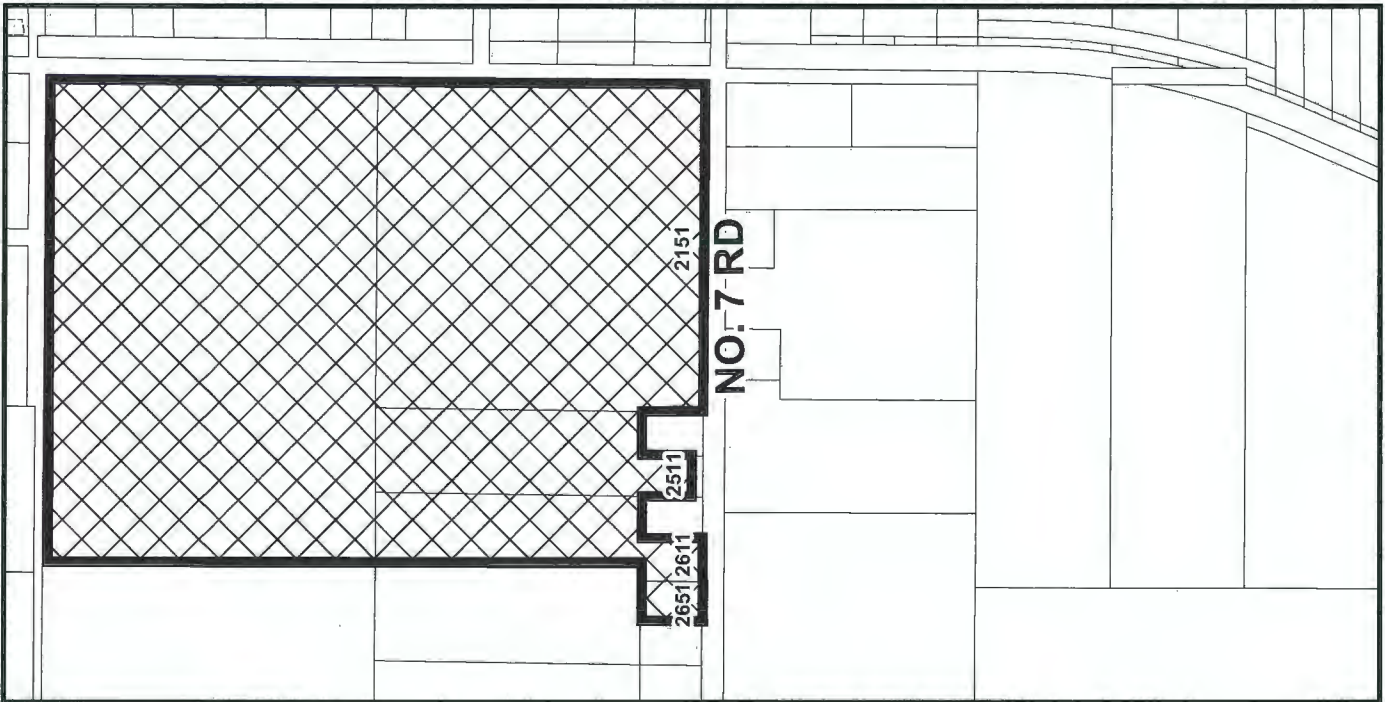
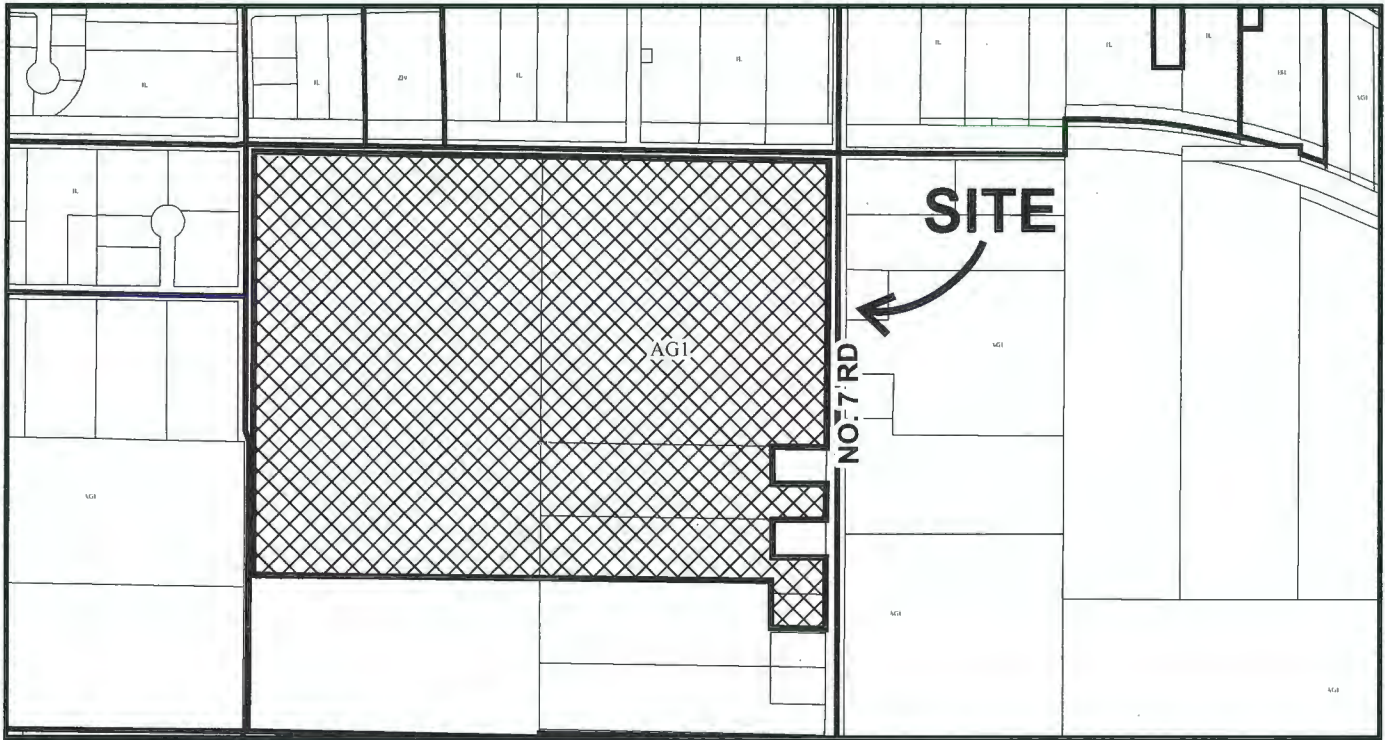
1. This Development Variance Permit is issued subject to compliance with all of the Bylaws of the City applicable thereto, except as specifically varied by this Permit.
2. This Development Variance Permit applies to and only to those lands shown cross-hatched on the attached Schedule "A" and any and all buildings, structures and other development thereon.
3. The "Richmond Zoning Bylaw 8500" is hereby varied as follows:
  - a) Reduce the minimum front yard setback for agricultural buildings and structures from 7.5 m to 1.87 m;
  - b) Reduce the minimum interior side yard setback for agricultural buildings and structures from 4.5 m to 0.58 m; and
  - c) Reduce the minimum lot area from 2.0 ha to 0.34 ha at 2651 No. 7 Road in order to resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road.
4. Subject to Section 692 of the Local Government Act, R.S.B.C.: buildings and structures shall be constructed generally in accordance with Plan #1 attached hereto.
5. The land described herein shall be developed generally in accordance with the terms and conditions and provisions of this Permit and any plans and specifications attached to this Permit which shall form a part hereof.
6. If the Holder does not commence the construction permitted by this Permit within 24 months of the date of this Permit, this Permit shall lapse.

This Permit is not a Building Permit.





# City of Richmond



DV 20-896703  
SCHEDULE "A"

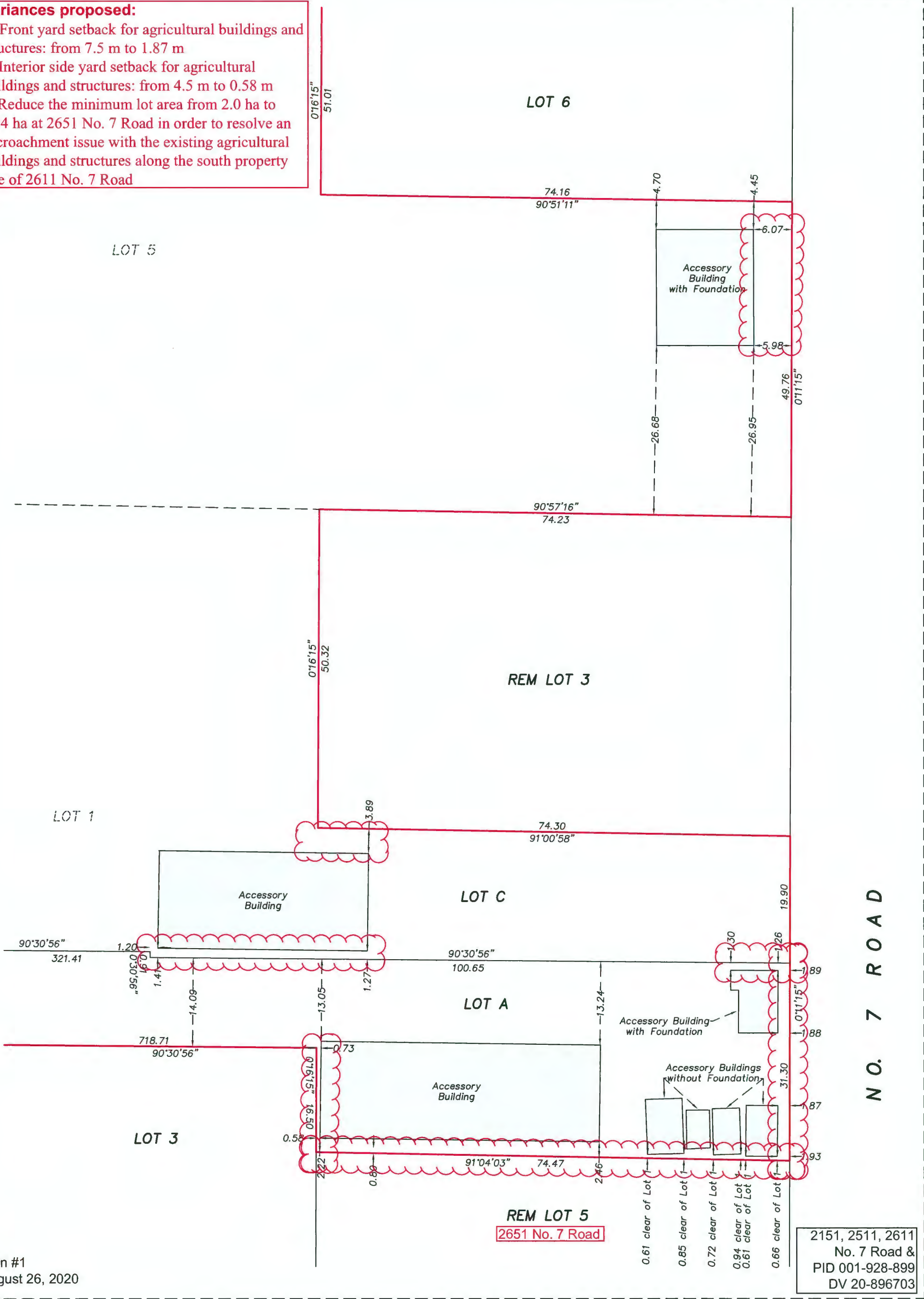
Original Date: 04/07/20

Revision Date: 08/19/25

Note: Dimensions are in METRES

**Variations proposed:**

- a) Front yard setback for agricultural buildings and structures: from 7.5 m to 1.87 m
- b) Interior side yard setback for agricultural buildings and structures: from 4.5 m to 0.58 m
- c) Reduce the minimum lot area from 2.0 ha to 0.34 ha at 2651 No. 7 Road in order to resolve an encroachment issue with the existing agricultural buildings and structures along the south property line of 2611 No. 7 Road



Plan #1  
August 26, 2020

2151, 2511, 2611  
No. 7 Road &  
PID 001-928-899  
DV 20-896703