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Municipality of North Cowichan

Via email: council@northcowichan.ca

Subject Duncan Cowichan Chamber of Commerce Review of Draft OCP

Dear Mayor and Council,

On behalf of the Duncan Cowichan Chamber of Commerce Members and Board of Directors, please accept this letter as our official response to the draft OCP.

Our Task Force gave this draft OCP significant attention and debate in the few weeks that were available to us to express our concerns with areas we believe need additional consideration and consultation.

We have attempted to fill the role of the “Voice of Business” in this review, as to the best of our understanding it was not previously sought out and included like other groups or organizations ie: 5 Key Environmental Stakeholders (P.12). Why were other ‘key’ stakeholders only identified at this late stage of the process, and invited to give final input on such a large and complex document?

As well, we take exception to the statement that despite the OCP being drafted during the pandemic, the consultant was ‘able to complete broad and far-reaching community engagement.’ (P.10) Public webinars with 56 participants and limited survey responses, that at best total 4% of the population (less those participants who are not residents and/or businesses in the community), indicate a lack of response and engagement by the community. It is concerning that only 4% of survey responses is shaping this OCP.

Our feedback is sorted by Sections below:

Section 2 - Vision, Goals, Principles & Frameworks

1. One of the principles of the OCP recognizes community engagement and the need to ‘actively seek out and listen to quieter community voices so that input is representative of all community members.’ (P.15) We do not feel there has been adequate engagement and while this OCP means to set the vision for the next 15-20 years, most residents and businesses have not participated to have their voices included. We’ve heard from the community that this online engagement was difficult to navigate and limited the ability to provide valuable input. We **urge** you to extend the timelines for public input and allow more time for participation and engagement, especially now that the PHO’s are allowing more in-person meetings.
2. Why were there only two over-arching frameworks identified: climate action, and social justice and equity? We strongly feel an economic framework would have added an additional lens to evaluate against, specifically to ensure that ‘families and individuals of all backgrounds have the opportunity to thrive and **prosper**’. (P.3)

Section 3 - Thoughtful Growth Management

1. The use of the word 'thoughtful' is subjective and should have a matrix of what would be included in 'thoughtful'.
2. We have concerns over the surety of LAP's being created for Berkey's Corner and Chemainus after the dismissal of the LAP for the Bell McKinnon area. This has resulted in a lack of confidence and trust by developers and the community. Why would residents in other communities want to invest their time and energy to contribute to an LAP that could be overturned?
3. We ask why Cowichan Commons is not included as a 'growth centre' when it satisfies so much of the criteria for the '15-minute walk' objective.
4. It appears the OCP is attempting to force citizens to live in densely packed areas, yet many people move here because of the semi-rural and rural properties. Limiting growth in some of these areas will decrease availability of housing which in turn will increase pricing.
5. The terms 'monster houses' and 'high consumptive lifestyles' (P.47) are subjective and hyperbole. Setting limits on the size of dwellings limits the owner from having their property obtain its' full potential and resale value. Property setbacks and other requirements to manage builds are already contained in zoning bylaws.

Section 4 - Resilient, Inclusive Communities

1. There are expectations that childcare spaces be provided by the developers. How does that translate to a development application? Is there a risk of being disqualified if that childhood space is not included?
2. It is generally understood that the activities and aspirations of the many objectives in this section come at a significant cost. There is an absence of any acknowledgement of how those costs will be met, aside from 'will ask the developer to'. This is of major concern.
3. Specific concern with Section 4.6.3 (V): 'Not permit any development that could restrict the construction of a future transit connection, greenway, active transportation corridor or road unless first identifying practical alternatives and/or amending the OCP.' How do you provide certainty to developers or business owners for an unidentified future project?

Section 5 – Attainable Housing: Diverse Housing Mix & Affordability

1. This section sets out a requirement of a mix of unit sizes including some family size units (3 to 4 beds), in multi-family buildings, and that provision is made for common play areas and, ideally, childcare facilities. This could make it harder for developers to consider developments here. When we have such a high demand for more housing, there needs to be an equal weight put on making it **easier** for developers to develop housing projects.
2. There appears to be a significant emphasis on non-market housing such as emergency shelters, transitional housing, assisted living, rent assistance etc.
3. What is meant by 'vehicle living'? (P.102) Are you advocating for people to sleep in cars as a housing solution?
4. Why should a developer be asked to provide residents with more notice and/or compensation than provincial legislation requires, when considering a re-development opportunity? How does this attract more housing to our community when unnecessary time and costs are added to a project?

Section 6 – Regeneration & Protection of the Natural Environment

1. In addition to supporting initiatives like establishing a 'no dumping zone', there should be requirements to check for failing septic systems on properties along the foreshore and a process to have them repaired or replaced.

2. Improvements in water quality should also apply in other bodies of water that have regular, ongoing issues such as Maple Bay beach, Fuller Lake and Kinsman beach, which often have 'swimming not recommended' notices.
3. Trees & Forests/Municipal Forest Reserve: We recommend further engagement and discussion with local business owners whose businesses involve working in or use of the forest reserve.
4. Natural Hazard Areas: We recommend an additional objective of minimizing risk of loss or damage to property, businesses, and disruptions to supply chains by ensuring improvements are made to infrastructure to better withstand natural hazards. This is to ensure continued economic activity.

Section 7 - Food Security and Local Agricultural Systems:

1. While we understand the need for sustainable farming, we are concerned there is not a balanced approach when it comes to housing needs and land use. There is concern that too much land would be protected from further development.
2. There is a concern that farmlands generate less tax revenue.
3. There is no mention of identifying under-utilized farmlands.
4. The plan demonstrates significant support of small-scale farms. However, it is absent in recognizing and supporting private and for-profit farms.

Section 8 - Local Regenerative Economy

1. An objective noted in this section 'is to protect & promote existing commercial enterprises and attract and encourage new business' (P.150), yet the OCP sets out more restrictions for business. As well businesses will be evaluated on their 'fit' (P.145) with the Municipality's economic development philosophy. This is subjective criteria.
2. An over emphasis on remote work options available through technology runs the risk of attracting high-paid remote workers whose incomes continue to drive up house prices and more importantly who are attached to head-offices who do NOT pay municipal taxes or even provincial taxes. This runs a risk of an imbalance of tax revenue for North Cowichan.
3. In many areas of this section, the OCP speaks to business and labour attraction, but the current lack of housing is a significant barrier to relocating or expanding a business that requires additional employees. The current lack of housing will contribute to the continued labour shortage crisis, expected to last for more than 10 years.
4. There is concern regarding the ability for small-scale, start-up and regenerative businesses to pay living wages or higher than the standard wage for their operation.
5. Developers and business owners will have to explain their approaches to "living wage", community contribution, climate action and reducing environmental impact **when applying** for a business licence. This will require additional staffing at the Municipality with the appropriate level of training to be able to critique these newly implemented criteria. Businesses risk not being approved for a business licence based on un-aligned values, despite conforming to other basic business standards. This can be perceived as undemocratic. Also, will this be retroactive and apply to business licence renewals for established businesses?
6. 'Developers and business owners will be asked to demonstrate that the childcare needs of employees can be met in the community or provide appropriate space within their business premises, for the purposes of new business or employment centres.' (P. 146) This is yet another increased cost of doing business in North Cowichan.
7. There are mixed messages in this document indicating limiting home-based businesses, yet at the same time encouraging people work from home.

8. We are concerned with the restriction on permitting additional drive-thrus. The statements regarding their association 'with fast food stores that are often visually unappealing' (P.150) are subjective and discriminatory as fast food stores are not always drive-thrus. In fact, most grocery stores have extensive fast food sections. Alternatively, not all drive-thru businesses are food related, ie: coffee shops, drycleaners, banks, pharmacies, flower shops, etc. They can be extremely useful for those with mobility issues or accessibility challenges.
9. 'Selective down-zoning of vacant heavy industrial lands to light industrial zoning, where the resumption of heavy industrial uses would be impactful on the local community' (P.152) may cause concerns for future development in new projects or for existing site expansions.

Overall, we wish to express our concern for the negative impacts this OCP will have on the economic activity of North Cowichan. In our opinion, the social philosophy and objectives behind this document will not only limit future development but increase costs to taxpayers. Housing development will not happen, current businesses will continue to be impacted by labour shortages, and affordability will continue to create even larger inequities in the community. Property taxes will have to increase to generate the revenue needed to cover new costs created from the OCP, thus increasing the burden on residents.

North Cowichan is already known as an unfriendly place to do business, and this OCP will reinforce this message. We strongly encourage you to review the areas noted above.

Thank you,



Julie Scurr
President
Duncan Cowichan Chamber of Commerce