

Kyle Young

From: ALC Referrals ALC:EX <ALC.Referrals@gov.bc.ca>
Sent: Thursday, June 2, 2022 4:41 PM
To: Kyle Young
Subject: RE: DRAFT City of Duncan OCP Referral

[EXTERNAL EMAIL] Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kyle,

Thanks for sending the draft OCP bylaw to the ALC for comment.

As there is no ALR land within, or adjacent to, the City of Duncan's municipal boundary, the ALC's interests are unaffected by the bylaw.

Regards,

Mike Bandy | Regional Planner – South Coast, Island, Kootenays
Agricultural Land Commission
201-4940 Canada Way, Burnaby, BC, V5G 4K6 | 236.468.3276
ALC.Referrals@gov.bc.ca | www.alc.gov.bc.ca

If you are not the intended recipient of this e-mail and attachments please notify the sender by return e-mail and delete the e-mail and attachments immediately. This e-mail and attachments may be confidential and privileged. Confidentiality and privilege are not lost by this e-mail and attachments having been sent to the wrong person. Any use of this e-mail and attachments by an unintended recipient is prohibited.

From: Kyle Young <kyoung@duncan.ca>
Sent: April 20, 2022 3:31 PM
To: ALC Referrals ALC:EX <ALC.Referrals@gov.bc.ca>
Subject: DRAFT City of Duncan OCP Referral

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Michael:

Please see attached and let me know if you have any questions.

Sincerely,

Kyle

Kyle Young
Manager of Planning



Kyle Young

From: eDAS@gov.bc.ca
Sent: Monday, June 20, 2022 11:57 AM
To: Kyle Young
Subject: Applicant Notification - File #2022-02126 (Task Id: 24334859)

[EXTERNAL EMAIL] Do not click links or open attachments unless you recognize the sender and know the content is safe.

Date: 2022-Jun-20

Hello,

The Ministry of Transportation Approval Application 2022-02126 is available for the next step and your action. You can access the file at
<https://posse.th.gov.bc.ca/DAP/Default.aspx?PossePresentation=ApprovalApplication&PosseObjectId=24169587&PossePane=Tasks>

Hi Kyle,

Thank you for circulating a copy of the City of Duncan's draft OCP. The Ministry has reviewed the document and have no comments or recommended changes.

If you have any questions please feel free to contact me.

Sincerely,

Jennifer Dyer
Development Officer
(778) 576-1109
Jennifer.Dyer@gov.bc.ca



FROM THE OFFICE OF THE SECRETARY TREASURER

May 30, 2022

Via email: kyoung@duncan.ca

Kyle Young
Manager of Planning
City of Duncan
200 Craig Street
Duncan, BC V9L 1W3

Dear Mr. Young:

Re: Draft City of Duncan Official Community Plan Referral

Thank you for the opportunity to comment on the Draft City of Duncan Official Community Plan.

The School District currently owns three schools within the boundaries of the City of Duncan, being Duncan Elementary (operating as the Cowichan Valley Open Learning Cooperative), Duncan Primary (under lease to Adage Dance Academy and Growing Together Childcare Society) and Charles Hoey (under lease to the Conseil scolaire francophone de la Colombie-Britannique).

The Board of Education is currently updating its Long-Range Facilities Plan (LRFP). The growth projections reported in the Draft Official Community Plan have been incorporated into the School District's enrolment projections. Looking forward ten years, the LRFP does not currently identify the need for any future properties for schools or support services within the boundaries of the City of Duncan.

The Board has determined that Duncan Primary and Charles Hoey are no longer required for school purposes. Both properties are currently under lease but could be disposed of in the future. You may wish to consider the best use for these sites within the Official Community Plan should they become available.

Yours truly,

Jason Sandquist, CPA, CGA, BAccS
Secretary-Treasurer

From: Emily Dixon <Emily.Dixon@cvrd.bc.ca>
Sent: Thursday, July 14, 2022 8:32 AM
To: Kyle Young
Subject: OCP Referral Comments

[EXTERNAL EMAIL] Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Kyle,

Please see the attached staff report and minutes from the July 13th Board meeting.

Thank you for the opportunity to comment on Duncan's OCP.

Regards,

Emily Dixon, MCP
Planner II
Community Planning Division
Land Use Services Department
Cowichan Valley Regional District
175 Ingram Street, Duncan, BC V9L 1N8
e-mail: emily.dixon@cvrd.bc.ca
Tel: 250.746.2639 / Toll Free: 1.800.665.3955 / Fax: 250.746.2698

I acknowledge that for thousands of years the Quw'utsun, Malahat, Ts'uubaa-asatx, Halalt, Penelakut, Stz'uminus, Lyackson, Pauquachin, Ditidaht & Pacheedaht Peoples have walked on the unceded territories where I now work.



STAFF REPORT TO COMMITTEE

DATE OF REPORT June 23, 2022

MEETING TYPE & DATE Electoral Area Services Committee Meeting of July 6, 2022

FROM: Community Planning Division
Land Use Services Department

SUBJECT: City of Duncan Referral – Draft Official Community Plan

FILE: 0400-60 COD 2022

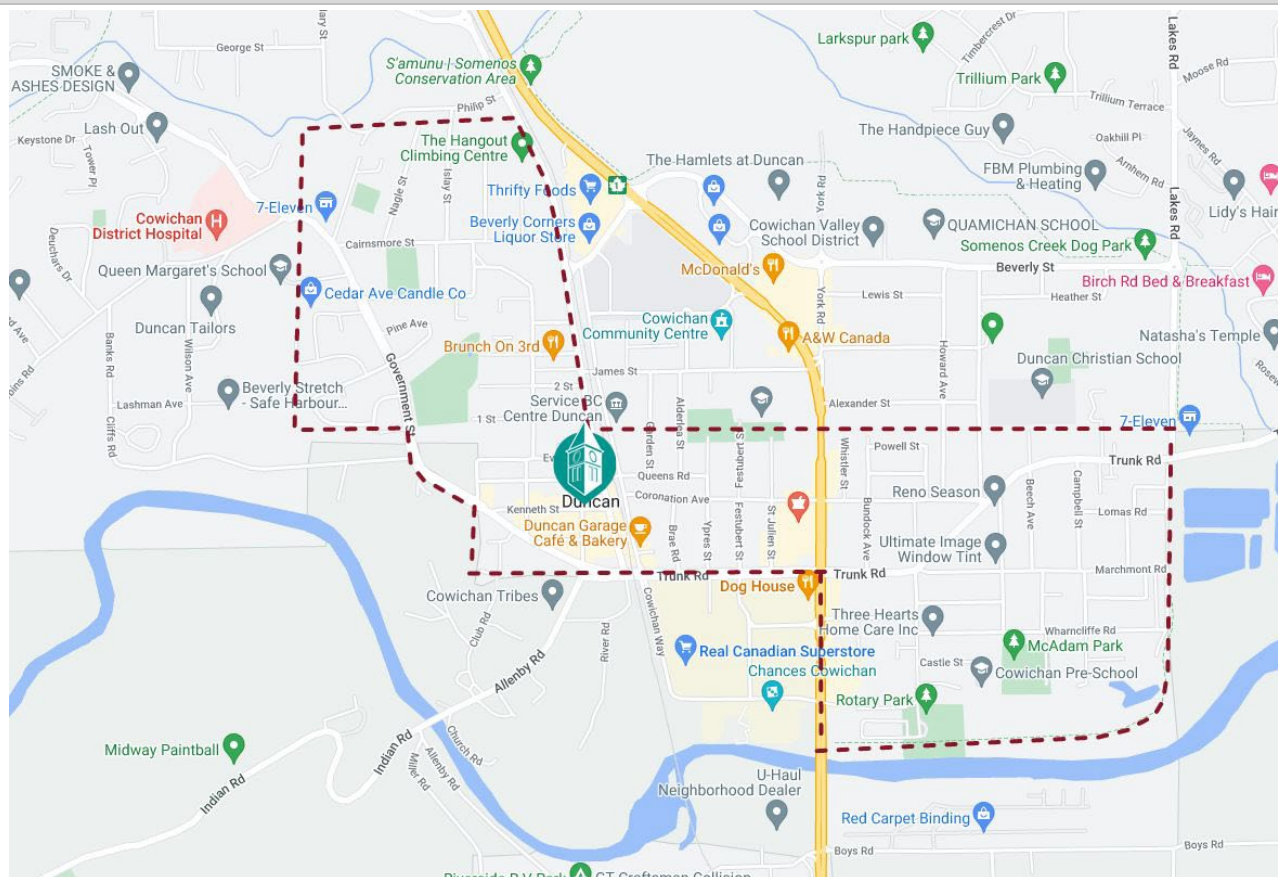
PURPOSE/INTRODUCTION

The purpose of this report is to seek direction on an appropriate response to the referral from the City of Duncan on their Draft Official Community Plan.

RECOMMENDED RESOLUTION

That it be recommended to the Board that the City of Duncan be informed that the Board supports the draft plan in principle and provides feedback as outlined in the Community Planning Division's June 23, 2022, staff report.

LOCATION MAP



BACKGROUND

Where a local government other than the CVRD proposes a change to one or more of their bylaws, their staff or Board/Council may refer the proposed amendment to a neighbouring regional district

to give the neighbour an opportunity to assess the proposal and comment. We are in receipt of such a referral from the City of Duncan.

In early 2021, the City began the process of updating its 2007 Official Community Plan (OCP). The primary purpose of this work was to undertake a comprehensive review of the underlying principles of the existing OCP and make any necessary adjustments to the vision, goals, objectives, and policies.

APPLICATION SUMMARY

The intent of the referral process is to seek official input from neighbouring local governments so that staff may present any input to City Council when bylaw readings are being considered. The public hearing, 3rd reading and adoption are tentatively set for July 2022.

COMMISSION / AGENCY / DEPARTMENTAL CONSIDERATIONS

The following comments have been received from internal Divisions:

Division	Comments
Transit	Generally, supports all transit-related policies as well as proposed policies and objectives to improve access to transit through pedestrian pathways, active transportation network and upgrading transit-supportive infrastructure. Recommends that they include reference to BC Transit's Infrastructure Design Guidelines when referencing placement of new shelters or bus stops. Further comments have been provided on the Draft plan document itself.
Economic Development	See Attachment B – COD Draft OCP Feedback
Environmental Services	Provide reference to the 'Climate Change Adaptation and Risk Management Strategy' as well as the updated 'Lower Cowichan/Koksilah River Flood Mapping Maps (2021)'
Community Planning	Staff generally support the draft OCP, and recommend additional policies addressing temporary accommodation, such as short-term rentals.

PLANNING ANALYSIS

The City of Duncan is one of four municipal governments within the geographic boundaries of the CVRD. The population, according to the 2021 census was 5,047 people, and has a land area of 2.06 km², making it the most densely populated municipality within the CVRD. Although the population of Duncan is small, it serves many of the region's electoral areas as a hub for commerce, recreation, services and more.

Electoral Area E – Cowichan Station/Sahtlam/Glenora and Electoral Area D – Cowichan Bay, are south of the City and share a border with Cowichan Tribes as well as the Municipality of North Cowichan. Parts of these areas are serviced by the City's water system as well as the Joint Utilities

Board (JUB) wastewater treatment system. Those maps are included in [Schedule S – Service Area Maps of the Official Community Plan for Electoral Areas Bylaw No. 4270](#).

The draft plan designates 8 land use designations and connects policy to land use decisions. Those are shown in Map B-1: Land Use Designations (Schedule B) of the draft plan. The 8 land use designations include:

1. Residential
2. Multi-family Residential (4-storey)
3. Multi-family Residential (6-storey)
4. Neighbourhood Commercial
5. Core Commercial
6. Gateway Commercial
7. Community
8. Park + Open Space

The Residential policies support many of the objectives one would expect to see in an urban setting. For example, a maximum of 2 dwelling units per parcel is supported, as well as attached or detached accessory dwelling units, as a means of increasing housing options and supporting affordable housing. The Residential policies also support accessory type uses including home-based businesses as a means of encouraging local economic gain. Although the Residential densities in these areas are the lowest in the City, featuring mostly single-family homes, staff support the residential policies and are encouraged to see City staff promoting infill in existing residential areas. Staff recommend policies supporting temporary accommodation including room-sharing or bed and breakfasts.

The Multi-family Residential policies support the transition between lower density residential neighborhoods and higher density residential uses and commercial areas in the downtown areas and along the Trans-Canada Highway Corridor. Staff are encouraged to see infill adjacent to commercial areas and within the core. The 6-storey to 4-storey transition seems appropriate as a way of encouraging further infill. Staff support the Multi-family Residential policies found in the plan.

The Neighbourhood Commercial policies support neighbourhood-scale commercial uses, primarily intended to serve the surrounding residential areas. The designation also supports multi-family dwelling units above ground floor commercial uses. Staff are encouraged to see policies discouraging drive through restaurants, motor vehicle-oriented uses or sales, gas stations and large-scale commercial uses.

The Core Commercial policies support retail, services, restaurants and cafes, and other commercial type uses in the core of the City. Similarly, staff are encouraged to see policies supporting a mix of uses, including residential on top of commercial uses, to a maximum height of 6 storeys. Staff recommend including policies geared toward preserving the heritage value of existing buildings in its core.

The Gateway Commercial policies are specific to commercial lands adjacent to the Trans-Canada Highway. Many of the policies seem to encourage pedestrian scale, ground-oriented development, characterized by comfortable pedestrian streetscapes but also support many vehicle-oriented uses such as gas stations and drive throughs. Staff support the implementation of the future multi-use pathway along the Trans-Canada Highway as a means of achieving these somewhat conflicting policies and supporting the implementation of a regional active transportation network. Staff are pleased to see policies encouraging underground or structured parking in new developments to reduce surface parking in the area. Staff recommend changing the photo in this section to a photo more applicable to the policies (pg. 72 of draft plan).

The Community policies support the integration of community uses (e.g. cultural and education services etc.) throughout the City. Staff support all draft policies.

The Parks and Open Space policies supports the collection of parks, plazas, natural areas and recreational spaces. Staff support all proposed Parks and Open Space policies.

The policies presented in the draft plan are generally consistent with the intentions of policies found in the Modernized Official Community Plan for the Electoral Areas insofar as they encourage density in suitable areas serviced by water and sewer, connect areas by alternative modes of transportation (e.g. reference to the draft [Regional Active Transportation Plan](#)), place importance on community aesthetic and heritage value, address climate change mitigation and adaptation, and prioritize the maintenance and restoration of environmentally sensitive areas.

The CVRD looks forward to coordinating with our municipal governments in achieving their policies, objectives and goals.

OPTIONS


Option 1 (recommended):

That it be recommended to the Board that the City of Duncan be informed that the Board supports the draft plan in principle and provides feedback as outlined in the Community Planning Division's June 23, 2022, staff report.

Option 2:

That the City of Duncan be informed that the Board does not support the draft plan, and requests changes, for reasons outlined by the Board.

Prepared by:


Emily Dixon, MCP
Planner II

Reviewed by:


Michelle Pressman, RPP, MCIP, MPlan
A/Manager
Ann Kjerulf, RPP, MCIP
General Manager

Reviewed for form and content and approved for submission to the Committee:

Resolution:

☒ Corporate Officer

Financial Considerations:

☒ Chief Financial Officer

ATTACHMENTS:

Attachment A – Draft Duncan OCP with Markups

Attachment B – COD Draft OCP Feedback – Letter from EDC



175 Ingram Street
Duncan, BC V9L 1N8
www.cvr.bc.ca

Office: 250.746.2500
Fax: 250.746.2513
Toll Free: 1.800.665.3955

June 3, 2022

File No.: 0400-60 COD 2022

Kyle Young
Manager of Planning
City of Duncan
200 Craig Street
DUNCAN, BC V9L 1W3

via email: developmentsservices@duncan.ca

Dear Mr. Young:

Re: City of Duncan Draft Official Community Plan Feedback

The following comments are provided by Economic Development Cowichan (EDC) staff in response to the request for feedback on the City of Duncan Draft Official Community Plan dated April 20, 2022.

Commercial and Industrial Land: EDC supports many of the policies presented in the draft OCP section 3.3 Economic Development, including #1 Assess feasibility of introducing hybrid commercial or light industrial lands into Duncan's land use mix, and #2 Consider adding new permitted uses to the Zoning Bylaw to support small scale manufacturing and processing. The Cowichan Industrial Land Use Strategy (2019) found an inadequate supply of appropriately sized and serviced industrial lands in prime locations. We support the inclusion of light industrial activities as allowed uses within the City of Duncan's commercial land use designations. EDC would recommend using stronger policy language with regards to adding new small scale manufacturing and processing uses within the City, going beyond "consider" to include directional policy language such as "encourage" and "support". Small scale manufacturing and processing can add to the vibrancy and revitalization of downtown cores.

EDC also recommends being less prescriptive regarding the types of uses allowed, and focusing instead on potential/desired impacts in order to create greater flexibility. One such impact that we would recommend is that commercial and industrial uses should provide high employment value. For example, self-storage facilities and car dealerships, while quite land-intensive, have little or no capacity to support high-paying jobs. EDC also supports the intensification of employment lands where servicing is available, to allow for greater density and diversity of employment opportunities within the City.

EDC recommends examining opportunities to allow for combined retail-industrial space, such as showroom-production uses, for properties in the Gateway Commercial land use designation. This use would support the growing number of design firms operating in the region, which are serving the booming construction industry in Cowichan. With retail-industrial land uses reaching saturation in the Nanaimo-area market, the City could play an important role in filling this demand.

Parking requirements, streetscapes and public space: EDC supports reducing parking requirements for development where it can be demonstrated that alternative forms of transportation are available. Generally, parking standards require an oversupply of parking, while parking management strategies can achieve adequate parking with fewer parking spaces, allowing for other valuable land uses in an already built environment. EDC also supports the inclusion of active transportation infrastructure with new developments, such as bicycle racks, which can capture tourist audiences such as bike tourists. EDC also recommends coordination with the [CVRD's Active Transportation Plan](#).

EDC also recommends the City consider making use of underutilized parking areas to allow for pop-up or temporary economic, community or cultural uses that would revitalize the community and add vibrancy. Pop-up parks, pop-up shops, food trucks, mini-festivals and outdoor markets all encourage local economic development and tourism. The Duncan Farmers Market is very successful, and the City can build on that success for other outdoor economic activities that align with the community's character. Similarly, EDC supports pedestrian only street pilots to encourage expanding business opportunities beyond indoor space. Public outdoor space is generally underutilized for economic activity. Even parks can provide space for temporary commercial uses that promote vibrancy without negatively impacting the park (such as food trucks or mobile vendors).

Infill development, Pre-zoning and development approvals: EDC supports infill development, and supports the creation of diverse housing forms to meet the needs of the community that still meet the character of neighbourhoods. EDC also supports updating the Development Cost Charge (DCC) Bylaw to reflect the true costs of servicing with development; however, would urge the City to consider reduction of DCCs or exemptions for development that provides substantial community amenity, such as the creation of affordable housing.

EDC supports pre-zoning areas destined for higher density in the OCP where appropriate to encourage the development of diverse housing types and commercial/industrial uses. While it's understood that pre-zoning land for higher density residential development may not allow for the negotiation of provision of community amenities, EDC supports the inclusion of density amenity bonusing regulations within pre-zoned lands to provide developers with clear expectations. Defined amenity bonus provisions reduce the risk and uncertainty with development, and allow for easier financing of development. Rezoning applications, even those aligned with OCP designations, are still subject to public input and political influence, and therefore are riskier by nature and less attractive to developers.

Similarly, the Cowichan Industrial Land Use Strategy identified complex regulatory processes and lengthy approval processes as key barriers to industrial expansion. This issue influences the cost recovery on investment and is a key driver in determining whether new businesses will locate in the region or whether existing businesses will expand. EDC supports pre-zoning of strategic properties within the City of Duncan that are appropriate for light industrial uses. EDC further supports the simplification and streamlining of the development approvals process within the City of Duncan to allow for greater clarity for developers.

Short-Term Rentals: EDC recommends including clarity around situations in which short-term rentals will be allowed within the City. Short-term rentals are rooms, suites, homes, etc that are

rented for stays of less than 30 days, and which are often not considered in OCP and zoning language outside of the typical bed and breakfast use. Short-term rentals support the local tourism industry by increasing the number of accommodation units, but they may also impact the supply of long-term housing for residents. Policy language in the OCP around short-term rentals would provide guidance for residents, developers and visitors. EDC is undertaking a [Workforce Housing Strategy](#) in 2022, which may help in providing guidance on this issue.

Utilities (3.10.1 Policy 38): EDC recommends including internet and cellular service providers under the City's definition of utility providers, so that connectivity infrastructure may be installed alongside other utilities, where appropriate. Internet and cellular connectivity are becoming increasingly essential in allowing access to education, healthcare, emergency services, business and employment opportunities. EDC is currently undertaking a [Connectivity Strategy](#), from which further defined actions may arise.

Child Care Facilities: EDC recommends allowing child care facilities as a principal or accessory use in any zone. The provision of child care is critical for allowing parents to participate in the workforce. The Cowichan region is in a child care 'desert' and anything the municipality can do to make provision of child care easier, such as allowing for child care in any zone, is beneficial for society and the economy.

EDC wishes to thank the City of Duncan for providing the opportunity to comment on the draft OCP and is looking forward to working with the municipality on implementing actions stemming from the adoption of the final document.

Sincerely,



Brittany Taylor, Acting Manager
Economic Development Cowichan

BT:jm

Duncan Cowichan Chamber of Commerce
2896 Drinkwater Rd., Duncan, BC V9L 6C2
T: 250.748.1111 | F: 250.746.8222
E: manager@duncancc.bc.ca | W: www.duncancc.bc.ca



June 1, 2022

Kyle Young
Manager of Planning
City of Duncan

Via email: developmentservices@duncan.ca

Subject: Duncan Cowichan Chamber of Commerce Review of City of Duncan Official Community Plan Update

Dear Kyle:

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

Our Task Force reviewed this draft OCP and would like to commend you on a very thorough, well thought out, articulated plan which makes sense. We appreciate the emphasis and recognition of the tourism sector and the considerations given to the business economy.

We are grateful to be invited to submit input and feedback on this draft document. We have attempted to fill the role of the "Voice of Business" in this review. Our feedback is sorted by Sections below:

Section 1 - Plan Overview

1. Our only concern is that the process for this review was compressed into one year and during the pandemic. We didn't see any numbers on the breakdown of community engagements (in-person, surveys, online forums, etc) to form the basis of this draft OCP. We believe these numbers would be impactful in this opening section.

Section 2 – Our Community

1. We feel the Population Growth estimates are conservative, considering the estimates for the Island are higher (30-year comparison to 5-year growth estimates for Vancouver Island). How do you manage population growth?

Section 3 – City Wide Policies

1. Comment: Great work on the trail network.
2. 3.8.1 Parks Open Spaces and Recreation. We notice an absence of collaboration with neighbouring communities with other parks and recreation facilities. ie: Sportsplex, Aquatic Centre, etc. We suggest applying the same content/statement as in other sections. ie: 3.9

Section 4 – Land Use Designations

1. Question under Gateway Commercial section: How are you intending to address Highway Corridor – Gateway Commercial lands in respect to beautification, image and security?
2. Observation: This OCP does not address short-term rentals such as Airbnb's and VRBO units. These are important to our tourism sector as we currently do not have adequate accommodation options to meet the need of tourism growth in the region. These accommodation units also contribute to the MRDT which in turn support destination marketing through Tourism Cowichan.

Section 5 – Development Permit Areas

1. Comment: Section looks good.

Section 6 – DPA # City-wide Standards

1. 6.1.5.7: Blue Green Infrastructure Approach: While we agree with the rational for landscaping requirements, it does mean extra expenses for business owners to comply with it. This is feedback received from members who continue to express concerns of the additional financial burden placed upon them to meet these requirements.
2. Regarding not allowing chain link fences: For visibility and security, chain link fences are a much better option than wood solid fencing which has a limited life.
3. Small note on street furnishings: Seating should be designed to deter long term loitering

Section 7 – DPA # 2 – Natural Environmental Category

1. Comment: Section looks good.

Section 8 – DPA # 2 – Hazard Lands

1. Comment: Section looks good.

Section 9 – Temporary Use Permits

1. 9.3: Temporary Use Permit for Emergency Shelters: We feel there should be reference to security requirements. We also don't feel it addresses security concerns of neighbouring communities.

Other than the minor comments noted above, we feel the plan is quite good. Thank you again for inviting us to provide comments from a business and tourism perspective.

Please let us know if you need any further clarity.

Thank you,



Julie Scurr
President
Duncan Cowichan Chamber of Commerce

Excellent care, for everyone,
everywhere, every time.



June 3, 2022

Kyle Young
Manager of Planning
City of Duncan
200 Craig St
Duncan, BC V9L 1W3

Re: Review – City of Duncan Official Community

Thank you for the opportunity to comment on the City of Duncan Official Community Plan.

Overall the Official Community Plan is comprehensive and takes into consideration many aspects of the healthy built environment framework which lends itself to healthy community outcomes. Island Health appreciates the opportunity to provide evidence-based comments for this OCP. Highlights, considerations and recommendations from the healthy built environment as well as the regulatory perspective are itemized below:

Healthy Built Environment Highlights

Healthy Neighborhood Design

Policy 3.1.1.1 (p22) encourages compact development and higher density. When people are able to work in the same area as they live and play they are socially more connected with their community, they have lower levels of stress, are more likely to engage in physical activity and tend to have better health outcomes.

Policy 3.1.1.5 (p22) strives to create universally accessible, pedestrian friendly neighbourhoods that are connected, cohesive and incorporate mixed uses to ensure there are as many activities of daily living as possible within walking distance. The City's small developable land base is largely built out with limited opportunities to expand except through redevelopment and infill. Land Use policies within the OCP support infill development for compact mixed-use neighbourhoods.

Policy 3.9.1.54 (p50) adoption of universal design standards in new and existing buildings to ensure accessibility for all ages and abilities. Removal of barriers to access allows all members of a community to engage in civic, cultural, social, and physical pursuits and foster a sense of belonging within the community. Regular and adequate physical activity, social engagement and a sense of belonging improves health outcomes, reduces the risk of chronic conditions, and helps protect against cognitive decline in older adults.

Medical Health Officer - Central Island Cowichan Valley Region

4th Flr, 238 Government St, Duncan, BC V9L 1A5

Tel: 250.737.2020 | Fax: 250.737.2008

viha.ca

Policy 3.4.1.28 (p38) encourage high density and multi-family residential developments to be located within walking distance of transit. Convenient access to public transit can encourage equity by enhancing mobility amongst a wide range of vulnerable groups including children, older adults, women and people with disabilities.

Healthy Transportation

Policies 3.3.1.10 (p27) & 3.4.1.5 (p32) ensure transit and active transportation networks connect to key employment and commercial centers to improve access for local workers, residents and visitors, and strive for complete, connected, accessible pedestrian, trail and bike networks that are integrated with neighbouring community networks. These policies promote enhanced connectivity between neighbourhoods and supports active transportation making active transportation options safe and convenient, promoting physical activity which leads to overall improvements in emotional and physical wellness, lessens obesity rates, and decreases the risk of chronic disease.

Policy 3.4.1.1 (p30) uses a modal hierarchy to guide and prioritize investment, space allocation and improvements. Prioritizing transportation modes that encourage walking/rolling to school, work and other activities will encourage physical activity and improved health outcomes in mental, physical, emotional well-being including cognitive functioning important in developing brains of youth and children. As well providing opportunities for alternate transportation options reduces the number of vehicles on roadways, which will reduce vehicle emissions, provide improvements to air quality, and lessen greenhouse gas emissions that contribute to climate change for improved community livability.

Policies 3.4.1.10, 3.4.1.12 & 3.4.1.13 (p34) support safe and accessible pedestrian and cycling routes to transit stops and major destinations, expansion of regional transit services to other centres, and continued support of HandyDART ensures better accessibility to transit system, which in turn supports aging in place, and encourages equity by enhancing mobility amongst a wide range of vulnerable groups including children, older adults, women and people with disabilities.

Policy 3.4.1.20 (p36) develop traffic calming policy to address speeding and safety supports active transportation and reduce injury risks. Traffic calming features such as narrow lanes and street trees can increase walking and perceptions of safety. Perceptions of safety and aesthetic quality of a route play an important part in influencing people's decision to walk or bike.

Healthy Natural Environment

Policies 3.5.1.4 & 3.5.1.9 (p40) preserving environmentally sensitive areas protect biodiversity. Current evidence supports a relationship between biodiversity and measures of ecosystem functioning such as improved water quality, soil health and pollination. Protection of biodiversity provides positive impacts on health outcomes.

Policy 3.8.1.6 (p48) aims to connect parks and open space to active transportation and transit networks. Research supports a strong relationship between exposure to nature and the reduction of stress, chronic disease, depression, anxiety, improved concentration and cognitive functioning. Greenways also have the ability to inspire active transport.

Policies 3.3.1.17 & 3.3.1.18 (p28) support businesses in creating remote work space to reduce office space needs and commuter travel will lessen the number of commuter on the roadways for improvements to air quality and also increased time for physical and leisure activities, for reduced stress and improved health outcomes.

Healthy Food Systems

Policy 3.5.1.11 (p40) supports community gardens through landscaping of streetscapes and reclamation of large paved areas improving access to affordable and healthy food for all residents may result in an increased in healthier food choices and a consumption of more nutritional foods.

Policy 3.6.1.12 (p43) look for options to expand local food systems and facilities and develop food security strategies. Improvements to local food security is a vital step to ensuring residents have sufficient, healthy food options to provide nourishment and reduce stress to residents during times of extreme weather events that risk supply chain disruptions and scarcity issues.

Policy 3.6.1.13 (p43) plans to identify areas in existing parkland and temporary vacant spaces to convert or preserve for urban agriculture to promote small-scale urban farming and help maintain a level and/or ability for local food production. Local level small scale farming and food production will build capacity of sustainable food supplies within local communities for improved food security and resiliency.

Healthy Housing

Policies 3.2.1.6, 3.2.1.7, and 3.2.1.8 (p24) provide strategies to support the development of new purpose-built rental housing, protect existing rental stock to increase availability of secure rental housing, and the retention and renewal of existing purpose-built rental housing that provides units at more affordable rates than new builds. Access to affordable housing decreases the frequency of moving between residences. Housing stability helps to reduce stress and allows people to take better care of themselves and their families. As well, living in adequate housing is strongly associated with an increased sense of safety, decreased crime and improved social connectedness when compared to living in poor quality housing. These factors help people enjoy better health and an improved quality of life.

Policies 3.2.1.11 (p24) and 3.2.1.12 (p25) encourages universal or adaptable design standards that consider mobility impairment and allow for ageing in place and special needs housing. Housing made accessible to people with disabilities allows them to continue to live independently in their homes.

Policy 3.2.1.16 (p25) work with community groups and developers to respond to housing affordability and homelessness. Island Health commends inclusion of policies that seek to increase the supportive housing sites, recognizing that secure housing is a basic human need and vital component of health and healing for those who are under housed or experiencing issues related to trauma, mental health and substance use disorder. A place to call home provides a sense of security and belonging, provides the necessities of health such as access to safe and reliable water sources for drinking and hygiene, and can shift people from surviving to thriving.

Additional encouraging themes:

Given the recent extreme weather events in the Cowichan Valley and anticipated climate change impacts in future, it is encouraging to see that the City has developed OCP policies that address climate change. The Plan will work towards a reduction in greenhouse gas emissions through incorporation of energy efficient design in buildings, strategies to support zero- and low-emission transportation modes. Initiatives presented here will aid in reducing the burden greenhouse gas emissions have on a regional and global scale. The plan also recognizes the need for adaptation to climate change and has presented policies to build resilience against climate events such as: increasing the urban tree canopy in public spaces while also encouraging an increase on private lands to improve shading and storm water interception, use of blue-green infrastructure design including permeable parking surfaces, development of a storm water master plan and implementation of flood control measure, service infrastructure design to accommodate periods of intense perception and increased flooding events.

The plan includes policies that integrate arts in planning, service and program decisions, support local and Indigenous artists, enhance public buildings, streetscapes and public spaces, improve the use of public open spaces for community events and ceremonies. The provision of art and cultural opportunities adds richness to the community and provides a place for social interactions and to develop a sense of belonging to the community. Social connectedness is beneficial to overall health and is linked to improved immune response and psychological well-being. Policies that connect people and enrich the community play an important role as communities move towards pandemic recovery.

The City of Duncan supports the provision of quality, affordable, accessible daycare and after school care located in residential areas. Quality childcare supports early childhood development, an important foundation for good health outcomes during childhood and into adulthood. Affordable childcare will allow more people to enter into the labour market and increase engagement and participation for all residents within their communities.

The Trans-Canada Highway Corridor cuts through the City of Duncan presenting safety and connectivity challenges. The City's promotion of safe, comfortable and convenient multi-modal transportation networks is supported and strengthened by the vision and recommendations set forth in the Cowichan Valley Transit Future Plan and the Trans Canada Highway – Corridor Management Plan: Boys Road to Beverly Street. Additionally, the City is in the process of developing a Transportation + Mobility Strategy (TMS), which should further enhance the above policies. Island Health welcomes any opportunity to provide health, evidence-based comments with respect to the upcoming TMS.

Regulatory Considerations**Drinking Water**

Policy 3.5.1.9 (p40) speaks to the protection and enhancement of local watersheds, environmental integrity and biological diversity through local stewardship programs, and strong working relationships with local and provincial governments. Inclusion of integrated watershed management planning and groundwater protection planning could strengthen this policy.

Policy 3.10.1.14 (p53) supports public awareness and understanding of best management practices through education and regular reporting of conditions. The BC Drinking Water Protection Act, requires an annual report be made available to water users. The last report published online was 2016. In addition to

meeting a regulatory requirement, the annual report can support this policy with respect to drinking water service.

Policy 3.10.1.15 (p55) proposes to prepare an updated water model and Water Master Plan that investigates the implications of densification (e.g. water needs and system requirements such as additional booster stations, capacity enhancements, pressure requirements etc.). This policy could be strengthened by including consultation with Island Health and other stakeholders, as well as planning for climate change impacts to ensure a safe, reliable and sustainable water supply. A Water Master Plan is an opportunity to investigate groundwater risk and plan for associated provincial treatment objectives.

Policy 3.10.1.16 (p55) refers to completing on-going upgrades to water mains. Ensure to consult with Island Health to meet requirements related to construction of water supply systems.

Policy 3.10.1.18 (p55) seeks to create a formal Maintenance Manual for the water distribution network. Consider including a formal maintenance program for the well supplies and reservoirs, as well as operations of the water supply system. Additionally, with water users outside of the City of Duncan boundaries and expected new development, this would be an opportunity to also incorporate a formal cross-connection control program.

Policy 3.10.1.17 (p55) commits to meeting or exceeding the BC Drinking Water Protection Act. With anticipated growth and diverse development, as well as climate change impact, Island Health supports ongoing review and updating of an Emergency Response and Contingency Plan that considers and responds these conditions that may impact the drinking water supply quality, quantity and reliability.

Guidelines 7.1.2 (p129 & 130) requires a Development Permit for any development within the vulnerable aquifer area that includes auto repair shops, car washes, dry cleaning facilities, gas stations, recycling depots and an aquifer protection plan. The DPA policies could be strengthened by requiring new developments to address cross-connection control planning including for any temporary water service provision on site during development

Food Safety

Policies within the OCP considers options to expand local food facilities as well as support food sharing/distribution and roadside stands. Ensure consulting with Island Health is carried out to meet construction and operating permit requirements under the BC Food Premises Regulation.

Policy 3.8.1.1 (p48) encourages the use of McAdam Field for use as food markets. As a reminder, temporary food markets must follow the Guidelines for the Sale of Food at Temporary Food Markets.

Greywater Reuse & Rainwater

3.10.1.20 (p55) mentions greywater reuse and rainwater harvesting. The OCP does not specifically refer to rainwater harvested for potable use. If this is being considered, please note the BC Guidance for Treatment of Rainwater Harvested for Potable Use and contact Island Health regarding permitting requirements. Wastewater systems with daily design flows of less than 22.7 m³/day are sewerage systems under the Sewerage System Regulation. Re-use of reclaimed water, including reclaimed greywater, is managed under the Municipal Wastewater Regulation. Contact Island Health for further guidance.

Recommendations under Island Health's Healthy Built Environment Initiative

1. The OCP's promotion of affordable and special needs housing options is commendable. Increasing access

to affordable housing through the provision of various forms and types does have proven health benefits. Focusing on core housing needs takes into consideration adequacy, affordability and suitability of housing options to ensure minimum structural standards are met, suitable size / number of bedrooms, and affordability at a cost of less than 30% of the total before-tax household income.

2. Establishment of an emergency preparedness program and provision of emergency shelters and support services for people currently or at-risk of becoming homeless is incorporated within the policies of the OCP. Consider transportation needs for mobility challenged and needs of other vulnerable community members in emergency readiness planning.
3. Consider supportive housing design standards that include a common room that provide opportunities for social engagement and can act as a cooling space during summer heat events and a warming shelter for unhoused individuals during cold, wet weather in winter months.
4. Local Health Area profile (Cowichan Valley South LHA 421 – which includes Duncan) indicates a higher level of toxic drug overdose death compared to Island Health and BC. The province declared the overdose public health emergency in 2016¹. Consider the inclusion of trauma-informed strategies that aim to address the impact of this crisis on the community within the Community Services and Safety section.
5. The City of Duncan has limited availability of public washrooms. In addition to meeting basic human needs, washrooms also offer access to adequate hand hygiene and can support active transportation and community participation for residents.

If you have any questions or comments please do not hesitate to contact the undersigned for further clarification or to discuss further.

Sincerely,



Shannon Waters, MD, MHSc, FRCPC
Medical Health Officer
Cowichan Valley Region

cc: Angela Wheeler, Built Environment Consultant
Alicia Parayno, Environmental Health Officer
Heather Hutton, Team Lead, Environmental Health

SW/sv

¹ Retrieved from <https://www.islandhealth.ca/sites/default/files/cowichan-valley-south-local-health-area-profile.pdf>

Kyle Young

From: Sandy McPherson
Sent: Tuesday, May 31, 2022 2:18 PM
To: Development Services
Subject: Duncan OCP

[EXTERNAL EMAIL] Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

First of all thank you for the opportunity to respond to your OCP revision. An area of focus for me is the health of our environment, both outdoors and indoors. It is well known that the burning of fossil fuels have had, and will continue to have, a huge impact on the climate.

Mitigation INDOORS is one area where we can make a major difference immediately. People are known to be spending far more time indoors than outdoors these days. Several studies have now shown that indoor air quality is significantly impacted by the use of gas to heat homes, hot water and for cooking. The increase in NO₂ is sometimes found to be at toxic levels due to fugitive emissions and overall poor maintenance of gas appliances. This can be prevented when homes are retrofitted, with rebate support, and the implementation of a policy to disallow new builds to use fossil fuels. North Vancouver, Vancouver and most recently Nanaimo have moved to *“support, prioritize and advocate for low carbon energy systems in all new construction”*.

<https://www.cbc.ca/news/science/gas-stoves-air-pollution-1.6394514>

<https://www.canada.ca/en/health-canada/services/publications/healthy-living/residential-indoor-air-quality-guideline-nitrogen-dioxide.html>

<https://rmi.org/insight/gas-stoves-pollution-health/>

With transportation and the built environment being two huge emitters of GHGs, please strongly consider adding the elimination of fossil fuels to the built environment to the OCP revision. Another objective in Section 3.6 could be added. In community,

~ Ms. Sandy McPherson