



Comments on the OCP draft – October 17, 2021

Preamble

While our comments are offered to Dialog, the consultant responsible for developing the OCP, they are also offered to Council. Council set the direction for this OCP with the wording of the Request for Proposal (RFP) and has overseen planning staff throughout the OCP development process.

Over the past year, Transition Sooke has addressed the pivotal issues of climate and growth in relation to the OCP:

1. In September 2020, Transition Sooke addressed Council on the need to make the climate emergency an over-arching theme in the OCP.
2. In February 2021, we presented a clear message to the OCP Advisory Committee — if Sooke continues to follow current growth trends, it will create more and more greenhouse gas emissions and destroy its carbon sinks. Meeting targets for GHG reductions will be impossible.
3. In early March 2021, Transition Sooke offered a definition of Climate First to assist council with the implementation of CAC's Work Plan 2020. Transition Sooke also prepared a comparison between its proposed Climate First and the District's Low Carbon Resilience (LCR).
4. In early April 2021, Transition Sooke issued a news release with an alternative to the three growth scenarios (A, B and C) that were developed by Dialog as part of phase 2 of the engagement process. Transition Sooke prepared a Scenario D to focus on low carbon and low growth. Scenario D allocates most of the low growth to the Town Centre of Sooke. It envisions a combination of subsidized, affordable, zero-energy housing, independent and local commercial businesses, and lots of access to the ocean for the community to enjoy.
5. Also, in April 2021, Transition Sooke offered a more sustainable approach to a proposed massive shopping plaza on Eustace Road, highlighting low carbon, local, made-in-Sooke businesses.

6. On June 26, Transition Sooke held a virtual Town Hall titled: “To Grow or Not to Grow: Developing a Liveable Sooke in a Climate Emergency” that featured “Growing Pains,” a video of Sooke residents speaking to the issue.
7. On August 17, Transition Sooke wrote a letter to Council praising its unanimous passing of the Climate Action Committee’s Climate Mitigation Strategy, the 7% Solution. The letter highlighted the tough decisions Council would need to make in order to implement the 7% Solution and offered Transition Sooke’s assistance in the work. Transition Sooke urged Sooke Council to proceed and act with the urgency that a declared climate emergency demands and that our children and grandchildren have every right to expect.

(Note: information on all these initiatives 1 – 7 can be found in more detail here: <https://transitionsooke.org/official-community-plan-and-climate-action-team/>)

The two main challenges for Sooke in the next 10 years appear to be Small Town – Small Carbon Footprint. We have to keep our town small while reducing our carbon emissions.

If you interview residents in Sooke, you will probably get a range of descriptions of Sooke as a “small town.” What makes Sooke a small town now? How can you keep it a small town? What is the height limit for a small town? Can this small town meet its GHG target and become climate resilient? These are the follow-up questions to the phase 1 engagement that weren’t asked.

This document summarizes Transition Sooke “big picture” thoughts on the draft OCP.

Structure of the draft OCP

There should be an executive summary of the OCP that credits where Sooke is today and supports its efforts to meet the climate emergency “head on.” The summary should state how each section of the OCP will reduce carbon emissions over the next 10 years, so that the cumulative reduction meets or exceeds the GHG target.

An executive summary should also guarantee that the vision of Sooke as a small, friendly town with abundance of wildlife habitat and green space is not swallowed up by a contrary vision of a bustling and vibrant town centre with 4-6 storey buildings and a traffic jam right past Connie Road.

In the opening “Community Context” sections, Climate follows, rather than precedes Housing, Demographics and Employment. This gives the impression that Climate is a challenge of the same magnitude as the other three, while in fact the other three depend on a livable climate. If the OCP addressed Climate first, people would understand that Housing, Demographics, Employment and everything else that follows would be situated in the context of the climate emergency. Thus, the urgent need for the many excellent climate friendly actions contained in the body of the OCP would be highlighted.

The placement of Land Use policies so far from the section on Development Permit Areas is challenging, as the two are closely related. A more accessible format would be to list the DPAs first, then the Land Use Policies and Actions, and then other policy areas such as employment, housing and equity.

Climate emergency

The climate emergency is not a dress rehearsal. We don't get another chance.

The province has mandated that OCPs set a target for reduction of CO_{2e} (GHGs) by 2030 and create policies that will achieve the target. We now have the District of Sooke's target of 50% reduction by 2030. The draft OCP's 40% target is inconsistent with the District's current commitment. We suggest removing the inconsistency.

Transition Sooke suggests that Climate Emergency should be the primary focus for an OCP that spans the next 10 years.

To help Sooke Council and citizens recognize and respond to the seriousness of the climate emergency, we need an OCP that deals with GHG reductions, as directed by the Local Government Act.

In places the OCP uses passive language when discussing climate threats, as though there is no urgency to the remaining 8 years before 2030. Saying that "monthly temperatures are anticipated to increase" (p. 21) sets this increase off in some distant future. It should instead acknowledge that the current reality of massive temperature fluctuation, drought and increased fire risk is very much a present concern.

The inconsistency of real numbers of tonnes of CO_{2e} is very confusing. The Climate Action Committee's plan to reduce GHGs by 50% contains all the numbers Dialog needs.

In the section "Journey to Net-Zero" (p.22) a chart shows a percentage breakdown of different GHG sources. Without reference to Sooke's actual GHG emissions, the chart is interesting but not very useful. We suggest using the 7% Solution numbers next to the percentages in the chart and including the current grand total — 48,386 tonnes CO_{2e} per year.

Page 23 contains a table showing emissions reductions, based on 2007 data, and sets targets in 5-year increments. These numbers are inconsistent with the 7% Solution that council has adopted. Unless Dialog can include a reason to include it and explain the discrepancy, we suggest removing it.

The draft OCP doesn't reference measures to address rising sea levels. A number of buildings in the district currently run the risk of flooding as sea levels continue to rise.

There is no clear statement about the warming effects of climate change and the value of both natural vegetative and topographic features for cooling as well as human-made features of housing design.

Greenhouse gas (GHG) emissions and growth

Transition Sooke has presented the dilemma of reducing Sooke's current GHGs while expanding its population. Clearing land to build new houses, diminishes Sooke's ability to store carbon. In addition, each new household contributes more GHGs to Sooke's current load, challenging further the resources of Sooke to meet its commitment.

According to the chart on page 11, "the OCP is a long-range planning document that strategically manages growth." While the draft OCP makes many references to Sooke continuing to grow at the current rate, the project consulting team states that the plan is "agnostic to whether population growth should be seen as positive, negative, or neutral; it neither creates population growth targets nor creates policies to explicitly encourage or prevent the population from expanding." (p 221, answers to the OCP Advisory Committee's concerns)

We wonder if there is such a position as "agnostic" in a climate emergency. Why wouldn't the OCP strategically weigh in on the impact of growth on attaining GHG emission targets? Why couldn't an OCP provide an estimate of the increased GHGs under different growth rates.

The OCP uses Statistics Canada information for estimating population growth in Sooke. In 2016, the last census, Stats Can reported that the size of population in Sooke was 13,060 in 2016. Using the estimate of 2.9% growth, they estimated the following: 18,521 by 2030; 22,065 by 2040; and 25,792 by 2050 (p 18).

We feel these projections are way too low— because our growth in the past couple of years is way more than 2.9%, according to CRD numbers. In the chart "CRD Demographics: Population Estimates July 1 Capital Region Fact Sheet (updated March 2021)" the following growth in Sooke is documented since 2011:

2011: 11,702

2016: 13,306

2017: 14,027 – growth rate from 2016 to 2017: 5.4%

2018: 14,438 – growth rate from 2017 to 2018: 2.9%

2019: 14, 573 – growth rate from 2018 to 2019: less than 1%

2020: 15,083 – growth rate from 2019 to 2020: 3.5%

These numbers reveal a rapid growth rate in Sooke between 2019 and 2020. The speculation is that growth between 3 and 5% will continue if uncontrolled.

Population projections and housing needs are based on speculation rather than planning. A growth rate of 3-5% must be changed to a rate that Sooke can manage given the current carbon emissions. We are aware that 1,200 residential units have been approved and will be constructed without the regulations necessary to maximize carbon reduction. What Transition Sooke proposes in Scenario D, is a change in future growth rate to 0.5%, mainly in the town core, and primarily low-cost, non-market, affordable housing.

Regional Growth Strategy/Regional Context Statement

The Regional Context Statement (RCS), which is part of the Regional Growth Strategy (RGS), will become part of the OCP. The RCS needs to align with the mandate to reduce carbon emissions. The draft OCP reserves a space for a revised RCS, but will the RCS be materially different?

There seems to be a lack of clarity around the RGS. The RGS began in the late 1990s as a way for municipalities to put a “cap” on growth, basically decide where growth would take place in their communities (urban containment) and decide how much that growth would be based on the number of people and the carrying capacity of the area). A number of municipalities have essentially done that — Oak Bay, Highlands, Metchosin, etc. — but other municipalities — Langford, Sooke and Colwood — resisted the whole process.

Land use

Land use is the main purpose of the OCP but with the climate emergency declared by Sooke, CRD and the province, it is critical that land use be situated within the climate emergency.

Land in Sooke has a high monetary value for developers, but it has an even higher value for carbon reduction over time. It is our one resource that supports our efforts to meet the climate emergency “head on.”

The OCP needs to highlight the importance of land in the climate emergency by creating policies that preserve land while eliminating loopholes that would sacrifice land.

The OCP needs to strictly protect undeveloped land, especially non-ALR agricultural land.

A made-in-Sooke OCP should focus on the vision of a “small town” with a small carbon footprint that can adapt to climate change rather than open up land to developers.

Land use can be aligned with the vision of a low carbon resilient small town if growth is held at 0.5% (Scenario D), allowing new development of affordable, non-market housing and LCR development of commercial and industrial space, without compromising the carbon sink.

Incentives for protecting our carbon sink

A number of threads in the OCP directly or indirectly support the protection of carbon sinks:

Action 4.2.1.5 – an updated inventory of existing biodiversity

Action 4.2.1.10 – Private stewardship of lands

Policy 4.2.3.1 – Preserving shoreline in the Sooke basin area

Policy 4.2.3.3 – Reducing pollutants in runoff

Action 4.2.2.4 – Urban forest Strategy

The OCP could specify the need for the District of Sooke to develop a tax incentive to benefit homeowners and Sooke’s need to set aside land for a carbon sink. Larger tracts of land would be taxed only on the developed portion of the land. Any land remaining (over one acre) could be designated by a “climate covenant.” The covenant would forbid development on that land. On their tax bills, landowners would see a cost for the value of their developed land and house, and the suspended cost and value for their covenant land.

This would allow Sooke, through the joint “stewardship” of the covenant land, to increase the amount of land used to drawdown GHG emissions through the use of natural carbon sinks in the district, and help maintain critical factors such as biodiversity, natural environments, reduction of air temperatures, and control of water runoff.

Zero-emission buildings

Section Page 86 “Green Building” is woefully short considering the importance that development and retrofitting existing buildings could play in the future of Sooke. This section, even if we cannot predict the “future,” states that green building will become a reality by 2023 – the future is not that far away.

CAC’s 7% Plan focusses on reducing GHGs from Buildings and Transportation. However, the sections pertaining to Buildings misses the urgent need to retrofit the housing stock and also seems a little soft on requirements for new builds.

We need very clear ideas on how to set Sooke on the path to zero-emission buildings that will not increase Sooke’s GHGs. The BC Step code will not get us to zero carbon, but it is a step in the right direction. However, all new buildings as of 2023 should meet Step 5 of the BC Step Code. This is clearly laid out for developers to follow. Through the building permit process that Sooke has at its disposal, require that all new building and development in Sooke meet, as stated in the draft OCP “. . . the net-zero emissions standards, meeting 100% of energy demand through renewable electrical means.”

The District should require the building permit to include EV chargers (which are mentioned elsewhere in the document as a goal) and solar panels for the production of electrical energy and hot water, both of which support the goals of “Green Buildings” and zero emissions.

Nothing is mentioned about the choice of green building materials in this section’s policies or actions. Policy 4.4.2.2 – Embodied Carbon — should clearly indicate that as of 2023 building permits will not allow buildings that contain a high level of embodied carbon such as in cement

and steel as the primary structural materials. This would likely alter the design of buildings being planned for Sooke between 2023 and 2030.

Missed references to district's ongoing work

The OCP document does not reference current work ongoing by District staff and voluntary committees such as the Climate Action Committee (CAC) and the Community Economic Development Committee (CEDC). OCP readers might have the impression that Sooke has no idea how some of the goals for climate will be met.

The CAC's draft Climate Action plan and 7% solution are very clear and contain tables that could illuminate the OCP. Similarly, the CEDC's draft Economic Development Strategy could provide needed direction for the economic development parts of the OCP.

Specific examples of these missed opportunities include:

- CAC 7% solution to 2030, already adopted by Council, could be presented on page 23 instead of the five-year Greenhouse Gas Emissions Reduction Targets.
- Goal Area 1 (page 32)— Green and Net-Zero — Goal 1.1 should reference a climate action plan and the 7% Solution to reach 50% emissions reduction by 2030.
- Dialog has explained that the 40% goal referenced in the draft OCP is consistent with Provincial law. However, the District of Sooke has committed to the 50% goal, which is consistent with the most recent Intergovernmental Panel on Climate Change (IPCC)'s directive that GHG emissions must be reduced by 50% by 2030 if we are to avoid more and more, longer lasting extreme weather events leading to catastrophic, runaway climate change.
- On page 19, the introductory Employment section draws on a 2016 snapshot of Sooke as a community where over half the people commute outside daily and seems to set the stage in the OCP for more of the same. Sooke Council and the Community Economic Development Committee are currently engaged in community economic development planning that will stand this "bedroom community" description on its head, by bolstering local businesses, increasing local employment, and reducing the need to commute. The OCP document should reference the new direction in this section.

Will anything change?

How does the district put OCP policies into practice?

According to the chart on page 11, the OCP is "a long-range planning document that strategically manages growth. The OCP defines policies for current land use and development, as well as addresses the needs of the future." The Zoning Bylaw is "a regulatory tool that is very specific about land use, density, where buildings are located on lots and how much lot they cover, and other issues such as landscaping."

The OCP policies need to have a very clear intent so successive councils can write bylaws with unwavering specifics. We find that the language in some of the policies is very vague and non-committal.

Many of the General Land Use Policies (page 42-43) use vague words such as encourage, foster or support. For example, Policy 3.3.14 “Encourage food production opportunities to be integrated into public and private lands and buildings throughout the District.” Each time Council deliberates on a developer’s proposal, staff would have the very difficult task of reading the proposal with an eye to whether it actually integrates food production opportunities or not.

And what happens if a particular proposal that Council is deliberating on doesn’t fit a policy in the OCP? The answer seems to be rezoning and variances. We need a policy statement that there are no rezoning or variances for a specific number of years after the adoption of an OCP.

The OCP will be around for 10 years, and likely there will be an entirely new Council trying to interpret this OCP. Thus, the more concise and prescriptive the OCP can be, the easier it will be for subsequent Councils to interpret.