

Planning Committee,

District of Metchosin.

27 May 2019

Dear Committee members,

**Re: 3659 Sooke Road proposal for a soil recycling centre**

The APRM Board has read the reports from the municipal planner and Madrone. It concludes that the above proposal conflicts with the “Keep Metchosin Rural” policy of the Mayor and Council, the CRD’s Blue-Green Spaces Strategy for Upland areas, and the objectives of the APRM. The APRM therefore strongly requests that you reject the proposal.

Should you still be minded to consider the proposal, the APRM has further specific significant objections to it.

*First*, the proposed use of a Temporary Use Permit (TUP) to allow the activity in an Upland zone creates a defacto industrial area within the zone for 3 to 6 years and probably into the foreseeable future.

*Second*, the use of the TUP and the Soil Deposition and Soil Removal bylaws to enable the proposal can only be seen as an end run around the need to rezone the property to accommodate the proposal. It is surprising that the Planner did not list rezoning as a third option for consideration by the Committee.

*Third*, the use of the bylaws and the TUP to permit the proposal would not provide any benefits to the municipality and community in contrast to what is possible through rezoning.

To rezone from Upland to Industrial is a considerable uplift in zoning, it would result in a significant increase in the value of the property and a higher tax revenue due to this increase and the higher tax rate for industrial land. It would also permit concessions to be required for the benefit of the community such as the requirement that the rest of the property be subject to an environmental covenant, or a contribution be made to the Park Acquisition Fund, or for management of the anticipated new park lands.

The sole beneficiary of the present proposal is the landowner, as fees will be charged for dumping the considerable volume of fill required for the work platform and for the later recycling.

*Fourth*, we have been advised that the cross sections in the Madrone report indicate that the cut and fill is not balanced and that approximately 30,000+m3 of fill will have to be imported to create the work platform, as up to 15m of fill would be required at the southeast corner. The Madrone report (p20) advises that the material imported to the site will come from within the CRD, which is not short of contaminated material. The proponent will be in a hurry to create the work platform so that the proposed plant could be constructed, meaning it is likely the fill for the platform would come from a number of sources, creating the conditions for contaminated fill to be brought to the site.

*Fifth*, the Madrone report (p32, Sec 5.4.3) indicates that the soils will be imported solely from CRD sites, it is not clear whether this is the region or the entity. If the entity is intended, it would be essential to see the contract prior to designing the inspection procedures. If it is the region, it contains plenty of contaminated soils, and a robust inspection regime would be necessary for the fill operation. Given the record of experience in Metchosin it would be unwise to rely on soil deliveries for the fill meeting the Contaminated Sites Regulation standards as suggested by Madrone.

Should this proposal be approved, the APRM strongly recommends that, at least for the permanent fill, the District engages its own QP to monitor and test soil deliveries and to charge the related costs to the proponent.

*Sixth*, in Section 5.4.1 (p31) Madrone advises there will be no rock crushing on site. In Sec 5.2 (p30) the advice is that “stones, cobbles and boulders” may be crushed. Clearly there will be a rock crusher on site with noise implications for all.

One interesting item from the Madrone report is that it proposes stripping the top and sub soils and storing them for site reclamation. This would be a very appropriate condition to apply to the proposed fill on Bennett Road under consideration by Council.

Presented on behalf of the APRM with agreement of President, Ken Farquharson

