

Date: November 19, 2025

by email

To: Gabriola Island Local Trust Committee.

Re: the November 20, 2025 staff report entitled: "OCP Project Update"

Please find below my questions regarding the staff report. I have copied sections of the report (italicized) that relate to my queries (yellow highlighted) found immediately after the extract. I have not followed all the discussions so may have missed or misconstrued some of the information in the report. If so please correct me.

1. Updated Project Charter

"The only item that has been changed is the date of the water balance assessment report. This corresponds with the LTC meeting schedule. If the LTC would like the report on the water balance assessment they can request staff schedule a special meeting to review it"

Queries: since the revised water balance assessment report will be available at the Feb 2026 LTC meeting, a meeting that will also potentially include a draft of the OCP, will the water balance assessment report information be somehow incorporated into draft OCP wording? And will the draft OCP also incorporate the data from the land suitability analysis? Are these 2 reports available to the general public? I was unable to locate either report on the Trust website.

2. Gabriola Buildout Map

"The buildout map along with the suitable land analysis provides the basis for decisions related to "reimagining growth"- considering where dwelling density potential could be removed, moved or increased based on an analysis of data related to environmental and cultural heritage protection considerations."

Queries: will the water balance assessment report also provide the basis for decisions on where densities are affected? I assume the buildout map is an updated version of the 2021 map. In addition to unrealized lots from subdivision, is there also an estimate of additional dwelling densities arising from secondary suites, split zoned lots and undeveloped lots?

3. Changing Subdivision Potential

"At their October 2025 LTC meeting the LTC requested staff provide "options and potential consequences to the removal of subdivision potential to support the Gabriola OCP project"

Recommended Option - Limiting subdivision potential to applications that deliver clear community benefits such as affordable housing, land conservation, or First Nations interests

Queries: removing (or limiting) subdivision potential is another way of saying "down zoning". In other words, the minimum lot and average lot size for subdivision would not apply unless the subdivision provided one of the benefits cited above and approved by the LTC? Is that what is intended? I am trying to understand the implementation. Or is there some way other than down zoning in order to "limit subdivision"?

Is this applied to all zones (other than say for example parks) or only to residential zones? Or does it also include non-residential zones that permit a dwelling as an accessory use? Is there an estimate as to how many potential lots would be affected and how many potential lots would be removed by this option?

Alternatives: (first option)

Maintain status quo:

No comment

Alternatives (second alternative)

“Restrict Subdivision only within 200 metres of Natural Boundary of the Sea: Remove subdivision potential (except for community-benefit projects) for parcels within 200 metres of the shoreline. Property owners could still apply to rezone for subdivision.”

Queries: this alternative refers to “removing subdivision” which I take as a rephrase of “limiting subdivision” and that it too is a downzoning option. Or am I missing a distinction between the two? How will it apply when a lot is only partly within the 200-metre boundary? How many lots fall would this option apply to and of those how many fall entirely or partly within the 200 metres boundary? How many potential lots would be removed?

I note that this option indicates property owners can apply to rezone for subdivision. The recommended option does not cite this. Should the recommended and alternative options 2 and 3 also indicate the rezoning and that like the 4th alternative would require an OCP and LUB amendment? Not clear why the 4th alternative wording differs.

Alternatives (third alternative)

“Restrict Subdivision only within 200 metres of Natural Boundary of the Sea and in areas of known and potential archaeological sites: Property owners could still apply to rezone for subdivision.”

Queries:

This becomes potentially an island wide restriction on subdivision. Known archaeological sites may be determined more readily than “potential sites”. How will the latter be determined? Who determines the “potential”?

Alternatives (fourth alternative)

“Support only Parkland and Protected Areas Subdivisions: Removes all remaining subdivision potential except for parks and protected areas. All other subdivision applications would require a bylaw amendment (OCP and LUB) including affordable/special needs housing owned and operated by a non-profit, First Nation, or government agency.”

Queries:

If an OCP and LUB amendment would be required for rezoning for affordable housing (as is the case under the current bylaws), wouldn't a permitted subdivision for affordable housing under the recommended approach also require an OCP and LUB amendment? Or is there some way of allowing a subdivision for affordable housing under the recommended approach that obviates the need for an OCP and LUB amendment?

Potential Consequences - Subdivision is one of the most influential tools shaping settlement patterns on Gabriola, yet subdivision potential has often been considered without fully accounting for environmental limits or cultural heritage impacts. Creating new lots rarely results in affordable or diverse housing; instead, it can increase land values, encourage speculation, and fragment larger parcels that might otherwise support ecological protection or community oriented housing options (e.g. land sharing, cluster housing).

Queries: the impacts identified above also apply when adding new densities to a lot. What percentage of lots currently permitted to have a secondary suite actually have such a suite? Has there been a large take up? If not, why?

4. Options for Non-Conforming Dwellings

Staff note that, without an occupancy permit issued by the Regional District of Nanaimo, there is no assurance that health and safety standards have been met, as regulatory oversight is limited. One approach used by other Local Trust Committees is to support the siting of dwellings that meet Canadian Standards Association (CSA) certification as an alternative means of verifying construction and safety where buildings do not meet the BC Building Code. For example, Mayne Island previously permitted the long-term residential use of RVs, but due to health and habitability concerns, these regulations are being amended to allow RVs only through TUPs for temporary use. Mayne Island has also introduced regulations supporting tiny homes that meet CSA certification, and staff intend to incorporate similar direction in the draft OCP.

Queries: does approving dwellings that may meet CSA standards but not the Building Code standards and requisite permits avoid any liability issues for the LTC? Does a TUP avoid liability?

- “• **Cluster Housing:** A development form in which several smaller detached or semi-detached dwellings are grouped on a single lot, often sharing common open space and infrastructure. Housing agreements are required and floor area limits are recommended.
- **Small Unit Clustered Housing:** Similar to cluster housing, but focused on small or mobile units (e.g., tiny homes, manufactured homes) with shared facilities. Housing agreements required and floor area limits recommended.
- **Flexible Housing:** multiple additional dwelling units within a maximum combined floor area, based on lot size. Would not require housing agreements.
- **Density Bonus:** Allow additional density if specific criteria are met, e.g., conservation covenant registration, affordable housing contributions, or land donation to First Nations”

Queries: the first two options (cluster and small unit clustered) appear to be layout options for affordable housing (ie rather than an apartment, duplex or triplex etc) and not distinct options. Are these not already possible under the current bylaws? Or is this about separate ownership of each unit?

The third option is not a form of affordable housing. Are these units rental or owned? How many new residential densities would this potentially create? I assume this would not fall under the recommended option #3 changing subdivision potential. Is that correct?

Is the “density bonus” option linked to the recommended option #3 (changing subdivision potential) or in addition to that recommended? It reads as if it is linked to that recommendation..

“At the October 2025 LTC meeting the LTC requested staff update the “What We Heard” report to include details related to support for housing options. These have been added (see Attachment 2).”

Queries: attachment 2 is missing from the report.

6 DPA assessment

The 2026/27 budget has not included funding for DPA work. However, Staff recommend including a DPA priority list in the implementation section of the revised OCP. To facilitate consideration of priorities, an analysis of DPA priority is provided below. This is provided for information only, to be discussed in more detail following a presentation of draft bylaws in February 2026.

Queries unless the LTC updating and establishes any new DPA s now these changes will end up sitting on the LTC to-do list for years much like the steep slope DPA update a few years back that got put on hold. Will the LTC support doing it now?

Another factor is the potential impact of a recent report from the CAO of the Islands Trust which is recommending no new projects for a time to enable a reorganization of how staff operate. The CAO’s report can be found in the November 19, 2025 Executive Committee meeting agenda.

Table 1 – DPA Options

Forested Areas	8	No Examples No Model	No – would need to update	Strong interest.	Priority – start with assessment of land
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Queries the table item #8 indicates no Forested Areas DPA exists. However, wouldn’t the island-wide Tree Cutting DPA on Galiano fall under this heading

Concluding questions:

Will the OCP refer to the preservation and protection of island rural communities?

Will the public be provided an estimate as to how many new densities (i.e. beyond what is permissible under the current bylaws)? There is a strong focus on increasing residential densities with a minimal nod to environmental protection policies, which is concerning.

A response would be appreciated.

Thank you,
Respectfully submitted.

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Gabriola Island