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Sent: Monday, July 6, 2026 2:56 PM

To: northinfo <northinfo@islandstrust.bc.ca>; Narissa Chadwick <nchadwick@islandstrust.bc.ca>

Subject: Draft OCP review

June 30, 2026

To: Gabriola Island Trustees and Staff

Re: Draft Official Gabriola Community Plan

From: Alix Hodson Deggan and Andrew Deggan

We do not support the draft OCP as it places too much emphasis on facilitating development at the expense of the rural character, groundwater, ecosystems, and raises a number of policy questions. In point of fact this draft does not reflect the concerns expressed by the majority of participants in the community meetings as referred to in [1.4.2](#) under the headings of:

a. Community Visions and Values- Protection of the Natural Environment and Biodiversity to maintain healthy natural systems *"Prioritizing the protection, enhancement, and restoration of environmentally sensitive areas, ecosystems at risk, and biodiversity to maintain healthy natural systems.*

And....

b. Community Resilience and Climate Readiness *"Reducing risk and strengthen the Island's ability to anticipate, adapt, and thrive amid climate change by safeguarding critical systems and embedding climate resilience in decision making."*

The companion reader explains that the policies have to be flexible in order to allow change when needed. This may be true in some areas, but not in the preservation and protection of our declining island groundwater, struggling recharge forests and unhealthy environment. Preservation and protection of the natural environment is the Trust's core mandate and it is not negotiable.

In point of fact, environmental policies that protect "must not" be flexible and "must be" measurable with predictable outcomes. Policy language, using modal auxiliary verbs *"shall"*, *"should consider"*, *"should"*, *"may"* are less directive. For instance, *must* before *regulate* is less discretionary and makes the public more aware of its effect. Preservation and protection of the natural environment *must be* mandatory and contained within the OCP plan as a Land-Use bylaw (amendments not optional). As is, the draft OCP and its discretionary language does not adequately protect the groundwater recharge, riparian or sensitive forest ecosystem areas.

Flex housing goes against the preservation and protection of the quality and quantity of the groundwater, as it permits adding new unrestrained densities by way of Land-Use Bylaw amendment. These dwelling units would not be affordable non-market units which conflicts with the OCP policy of focusing on non-market units.

“Contradiction and conflicting policies” nullify preservation and protection of the ecosystem:

High to Very extreme stress (more than 40% of recharge is used) observed in more developed areas with small lots and mixed commercial, institutional and residential use, such as the Village areas, and subdivisions in the north, northwest and northeast island (Pg 73, Freshwater Footprint report).

1. Encouraging commercial development in high to extreme Freshwater Footprint (FF) areas with only the caveat that they have to **be aware of their water use**, is seriously inadequate. With respect to policy **2.3.1.1 expanding the village area should be removed**. The draft policy **increasing the concentration of new development in an extreme water stressed area** is not only ambiguous, but also too destructive. Does it mean rezoning lots to village commercial or changing the floor area ratio for that zone to allow for more density?

The village area must not have any policies that permit increases in the density or intensity of groundwater demand and quantities of effluence.

Increasing densities and overpopulation in **FF High Hazard areas** dependent upon a shrinking supply of groundwater leaves nothing for essential ecosystem survival.

2.3.1.1 Increase the concentration of new development in the village commercial areas...and **DPA 318 development in Village and small-scale building contradicts and nullifies**

2.5.1.2.2 bylaw amendments should not result in development that is anticipated to:

- **cause significant harm to terrestrial, freshwater, or marine ecosystems**
- **disrupt habitat connectivity or**
- **undermine ecosystem resilience** and

2.2.3.1 Protect the quality and quantity of Gabriola's Islands freshwater resources and ensure that neither the density nor the intensity of land uses is increased where the quality and quantity of the supply of freshwater is likely to be inadequate or increase the vulnerability of freshwater supply.

There is no logical justification for increasing density in this area when it promotes the further decline of the local groundwater quality and quantity.

2. Development and population density have a strong effect on the Freshwater Footprint hazard areas (pg. 124). Effluence increases per capita. According to Freshwater Footprint data: *From the 500 Gabriola wells sampled the following contaminants were present: total coliform bacteria in 60%, e.coli*

bacteria (fecal matter, viruses and pathogens) in 33% and higher than average concentrations due to land-use (nitrates, pg. 105 and 129, FF).

Both “flexible housing” and “multi-density housing” will contribute concentrations of effluence in excess of the average for a two-person household, as shown in Stats Can for Gabriola.

2.4.3.7.1 24 units per development permitting multiple dwellings per parcel of land and 2.4.2.1.2 supporting flexible housing options by permitting two or more small dwellings within a maximum combined floor area on a lot as an alternative to one single large dwelling **contradicts and nullifies** 2.5.1.2 *development should not result in significant harm or undermine ecosystem resilience* and 2.5.1.4.5 there should be sufficient quality and quantity of freshwater to support the proposed use without adverse effect to existing water users, neighbouring properties;

3. Flexible housing is simply a different label for density increase.

2.4.2.1.2 (see above) **conflicts with** 1.2.4 Given the fresh water limitation and interests in preserving and protecting the environment on the island then provision of housing should be limited and focussed on the type of housing that is needed most—non market housing attainable by low to middle income residents.

Tiny homes and flex housing are **forms of market housing**^{*1} based on the OCP’s definition of affordable housing. Smaller does not make them a form of affordable housing and the **groundwater** they use and **effluence** they produce is not based on house size.

These policies are not constrained and will open the island to increased development leading to overdemand, overextraction of groundwater and higher concentrations of effluence.

2.4.2.1.2 allowing two or more small dwellings within a maximum combined floor area on a lot as an alternative to one single dwelling **contradicts**

Objective 2.2.2.1 ensuring that land-use planning prioritizes ecosystem protection...freshwater vulnerability and

2.2.3.1 protect the quality and quantity of Gabriola’s freshwater resources and ensure that neither the density nor the intensity of land uses is increased where the quality and quantity of the supply of freshwater is likely to be inadequate or increase the vulnerability of freshwater supply and

2.4.2.9.1 bylaw amendments or increases in density and intensity should demonstrate no adverse effects on quality and quantity of groundwater

4. Residential Density policies.

2.4.2.1.4 Increasing flexible housing and other approaches to increasing the number of dwelling units close to the village is in **conflict with and nullifies** 2.5.1.2 *development should not result in significant harm or undermine ecosystem resilience* and

2.5.1.4.5 sufficient evidence should be required of sufficient quality and quantity of freshwater to support the proposed use without adverse effect to existing water users, neighbouring properties

5. FF Hazard areas and essential forest groundwater recharge areas must be protected by individual zoning and land-use bylaws containing rigorous prescriptive language.

2.4.2.1.3 areas designated and zoned for “flexible housing” when considering amendments to refer the Plan and LUB are required to consider the following **2.5.1.3.1** related to ***Responsible Resource Stewardship: Freshwater Hazard Mapping (Schedule D)*** to assess the impacts of increased density and intensity on the sustainability of groundwater regions.

However, Schedule D map (OCP pg. 99) fails to clearly identify the *high to severe* **Groundwater Hazard** areas of the Village and Lockinvar Triangle. Where do they start and where do they end? Schedule E map (OCP pg. 100) has the same problem as Schedule D map except it is in the determination of the Aquifer Recharge areas. Just referencing the Map within policy does not provide clarification on how the Map is to be applied or details necessary to determine the groundwater stressed areas and their exact locations.

Due to the above conflicts and contradictions the draft OCP is not ready to progress to the 1st reading.

Footnotes:

1. Google AI: Refers to Market Housing properties that are rented or owned at prices determined by supply and demand. Prices are set based on current market conditions, reflecting the demand and supply in a specific area