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Sent: Friday, July 31, 2026 10:13 PM
To: northinfo <northinfo@islandstrust.bc.ca>
Subject: Draft OCP

Hello and thank you for providing an opportunity for me to give feedback on the Draft Community Plan for Gabriola Island.

I support the aims and intentions (as best I can interpret them) of the OCP and the changes from the previous OCP make sense.

General comments:

- Why do some policies use assertive language like “will” or “will not” or “shall”, but others, like 2.4.2.5.2 and 5.3, use the term “should”?
- For me, it is not clear for a number of proposed policies (see below) how they would be implemented in a land-use bylaw, or even if it would be enforceable if they were. Some read as “aspirational goals” rather than a clear policy statement that would direct how land is used or developed.
- There are no rationales or intentions described for policy statements. For many, the intention/rationale is implicitly clear from the objectives and vision statement of the OCP. For others, it is not at all clear.
- There are no specific definitions for terms used in many policy statements. A commonly accepted definition is crucial to understand how to implement policy. For example, (see below), how is “low-to-moderate” income defined? One standard deviation below the median? Below the low-income cutoffs defined by Statistics Canada?

Some specific comments follow in italics, with respect to the cited section:

Objective 2.2.5.1: Provide a range of housing options that meet the diverse needs of Gabriola residents, with attention to housing accessible to low and medium income residents and families.

Isn't this over-reach? How can housing be provided by land-use policies or the Islands Trust in general? “[Support the development of] a range of...” would make sense perhaps.

POLICY 2.4.2.1.5: Land use regulations should identify where detached secondary dwelling units must be located in relationship to the principal dwelling. Locating detached secondary dwelling units in close proximity to the principal dwelling is encouraged to reduce impact to the lot and facilitate sharing of well and septic system where feasible.

I was told that sharing a septic with 2 households was not allowed in the building code? Is this compatible with the RDN building code?

POLICY 2.4.2.2.1: A home occupation use should be permitted as an accessory use in all land use designations where a residential use is permitted. Land use regulations should establish conditions of use for home occupations, such as:

- **Specifying the range of uses permitted as a home occupation;**
- *does the existing LUB account for this policy?*
- What is the intent of limits? What is the rationale? i.e. noise? smells?
- off-street parking - how much?

POLICY 2.4.2.2.2: Bed and Breakfast tourist accommodation use may be permitted as a home occupation on a lot where the home occupation operator resides in the legal dwelling where the bed and breakfast occurs.

-so I couldn't have a detached cottage on the property that I offer as a B&B?

POLICY 2.4.2.5.2: The use of lands, buildings, or structures for the manufacturing or research of genetically engineered seeds, plants, or animals should not be permitted.

Why?!? If I decide to grow a GM apple or food, for the sale of the same, I'm not permitted? How is that going to be legal if the plant is approved by federal legislation? How is this relevant to the objectives of the OCP? Just because some individuals do not like or do not approve of genetic engineering, what is the rationale for banning it and does a local TC even have this authority?

POLICY 2.4.2.10.2: Property owners undertaking ground disturbance must implement a chance find protocol, including the immediate cessation of work and notification of the Province and affected First Nations if archaeological materials are encountered.

What is a chance find protocol? And how are they monitored/reviewed?

POLICY 2.4.3.7.2: All new multi-unit housing requires a housing agreement which restricts use to one or more of the following:

- o **Special needs residents living with physical or mental disabilities; and/or**
- o **Seniors 60 years of age or older; and/or**
- o **Low to moderate income individuals and families.**

Will there be a defined meaning of "low to moderate income?"

Village Centre is not actually defined in the OCP, is it?

POLICY 2.4.3.15.10: When necessary, shoreline erosion control should be achieved using an approach that protects and restores natural shoreline processes, and hard shoreline armouring (including seawalls, bulkheads, and riprap) should be prohibited, except where a qualified

professional confirms that no feasible nature-based alternative exists and the works are necessary to address an immediate threat to public safety or critical infrastructure.

Independence? If I am the developer who wants to do hard shoreline armouring, what is to stop me from “cherry-picking” my qualified professional to validate my intention? Shouldn’t such a judgement come from a non-interested third party?

POLICY 2.5.1.5.6: Support low-impact recreational uses

*This is not even a sentence, let alone a policy statement. support low-impact recreational uses **where?** in all land-use designations? How would this be implemented in bylaws? Moreover, how is ‘low-impact’ defined? In Alberta, many consider “low-impact recreational use” as driving quads in parkland!*

POLICY 2.5.1.5.7: Support the establishment of ecological reserves to expand parkland and public access while protecting environmental values.

POLICY 2.5.1.5.8: Encourage community parks within residential neighbourhoods to support local recreation needs, including, playgrounds, greenbelts, and pocket parks and the development of additional field space in close proximity to the Village Centre or existing playing fields.

Aren’t these simply wishful thinking statements? How can these policies be implemented in land-use bylaws?