

July 31, 2026

Context

The mandate of the Gabriola Island Land Stewards (GILSS) is to benefit Gabriolans and Snuneymuxw First Nation members and relieve poverty by acquiring and stewarding land on Gabriola Island under a community ownership model that promotes long-term community benefits, affordability and sustainability, and enables democratic local planning.

Key activities under our mandate are to:

- Provide and preserve access to affordable and supportive housing.
- Provide and preserve access to farm land in order to grow food, and learn agricultural skills through educational programs.
- Develop small-scale community economic development projects, and provide education and mentorship in business and entrepreneurial skills.

We have prepared this submission on the May 2026 draft OCP based on our mandate, as well as integrating updates from the July 15, 2026 LTC meeting agenda package and discussion into our comments below.

Our comments

The **Gabriola Draft OCP Companion Document** (May 2026, 17 pages) highlights the proposed ways that the draft OCP would change, directly comparing the current OCP with specific proposed changes and providing a rationale for the changes. We have organized our comments to reflect the key topics highlighted in the Companion Document, and added a focus on agriculture and food security in several places.

A. Document structure and community values

2.5.1.1 Integrating Indigenous interests

General comment: We strongly support integrating Indigenous interests into the OCP.

2.5.1.1.1 Suggest edit to 1st bullet: Indigenous Knowledge should be given equal weight to

Agriculture

If a property is not in the ALR, does property size really matter when it comes to farming? In a holistic responsible way, we should look at how houses are built, water issues, number

The Gabriola Island Land Stewards Society respectfully acknowledges that we are uninvited guests living and operating on the traditional, ancestral territory of the Snuneymuxw First Nation. We recognize their ongoing history, culture and traditions as careful stewards of the land and waters of the Gabriola Island area for millennia.

of trees to come down, and the impact of any development compared to property size. We need to future-proof the OCP to make sure we address the needs of people who are feeding us. Recommendation: Incorporate the *Farm Practices Protection (Right to Farm) Act* (1996) into the values section of the OCP (see the definition of “farm operations” from the *Right to Farm Act* at the end of this document), acknowledge that the *Right to Farm Act* is provincial and therefore overrides Official Community Plans in the Islands Trust Area on land that is zoned Agriculture or is in the ALR, and articulate the importance of farming to the future of Gabriola.

Rainwater collection

Recommendations: Include rainwater collection as a priority in the “values and what we are heading for” section, with a goal of 100% rainwater collection for potable water in all new builds and barged/transported-on housing. Under advocacy, 4.4.3.1, encourage the Trust to work with the Regional Districts and the provincial government in creating a fund to help property owners who cannot afford to install rainwater collection. We also suggest that the Trust work with the Regional Districts to create and distribute more public education on limiting water consumption.

B. Subdivision and density changes

2.3.1.1 says “Increase the concentration of new development in the village commercial area and *create secondary commercial nodes* [emphasis added] close to existing residential, service and amenity areas and on public transit routes.” 2.3.1.4 says “Increase the percentage of new development close to the public transit to encourage walking, cycling and transit use.” And 2.4.3.10 says “Secondary Commercial (SC) designation applies to areas outside of the Village Commercial area that support the needs of the immediate neighbourhood and the island as a whole.” Recommendation: Develop a clear and transparent process for designating secondary commercial nodes.

2.4.2.13: Recommendation: Add another subsection that, when evaluating subdivision applications, rainwater collection as a primary source of potable water should be a significant factor for allowing subdivision or a secondary dwelling.

C. Housing and additional units

1.2.4: Footnote explaining “core housing need” is very hard to understand

Tiny house clusters

2.4.3.6.2: Allowing multi tiny houses on properties smaller than 5 acres will make it possible for two or more people/families to buy a property together. Look at type of construction, what size, number of units, total floor area, clustering to avoid cutting down as many trees, etc. to maintain the rural character and feel of Gabriola.

With respect to flexible housing and limits on dwellings, we recommend the following limits on additional dwellings on a property when not in a freshwater hazard area:

- up to 1 acre: one dwelling only (can include a suite contained in the same building)
- 1-2 acres: maximum of 1 dwelling + 1 secondary suite (contained or separate) (@ the maximum square footage to be determined)
- 2-3 acres: maximum of 2 dwellings + 1 secondary suite (contained or separate) (@ the maximum square footage TBD)
- 3+ acres = maximum of 2 dwellings + 2 secondary suites (contained or separate) (@ the maximum square footage TBD)

We would like to see a conservative maximum square footage – much lower than we’ve seen in other documents. We recommend a requirement to have a professional assessment of the capacity of the land to provide water and treat wastes, and not to impinge on neighbouring properties, in order to add dwellings within the limits proposed above.

D. Farming and food security

There is a conflict between policies:

- 2.4.2.6.1 Agricultural uses should be permitted in all designations except for areas designated Parks and Protected Areas; and.
- 2.4.3.6.2: In the Rural Residential designation, land use regulations should:
 - Permit one principal dwelling per lot;
 - One principal dwelling and one secondary suite on lots 2 hectare or larger;
 - In addition to one principal dwelling and one secondary suite, one detached secondary dwelling unit may be permitted on lots 2 hectare or larger outside the freshwater hazard area;
 - Permit horticulture;
 - Permit agriculture on lots 2 hectare or larger; and
 - Permit accessory uses consistent with rural residential character.

However, GILSS does not think it is helpful to have definitions of or distinctions between agriculture and horticulture. We recommend relying on the definitions that the land titles office uses to define farm status. We also recommend adding a value statement that, in order to contribute to food security, people should be protected in the practise of whatever kind of food production that they are capable of doing on their property, regardless of the size,.

2.8 TUP policies: Based on the discussions at the July 15, 2026 Gabriola LTC meeting, vacation rentals on farming properties should be an accepted use. We recommend that this approach be taken on as an LTC project rather than a farmer having to apply - and pay - for continuing to go through the TUP process or apply for rezoning. Any rezoning required could specify that farming must be a permanent use of the property. Rationale: This makes it possible for some people to afford to farm. We need this kind of incentive to increase food security on Gabriola, and such a farming-specific advantage would be part of future-proofing the OCP.

E. Miscellaneous

Appendix 1: Definitions

Need definition for:

- Small scale secondary commercial uses (2.2.5.9).

Maps and legends in Schedules D & E and Appendices 2 & 3 are of poor quality/resolution and very hard to read. Information is missing.

Farm Practices Protection (Right to Farm) Act (1996)

FARMERS HAVE A RIGHT TO FARM in B.C.'s farming areas, on land in the Agricultural Land Reserve (ALR), in areas where land is zoned by local governments for farm use, or in licensed aquaculture areas.

Definitions: "farm operation" means any of the following activities involved in carrying on a farm business:

- a) growing, producing, raising or keeping animals or plants, including mushrooms, or the primary products of those plants or animals;
- b) clearing, draining, irrigating or cultivating land;
- c) using farm machinery, equipment, devices, materials and structures;
- d) applying fertilizers, manure, pesticides and biological control agents, including by ground and aerial spraying;
- e) conducting any other agricultural activity on, in or over agricultural land;

and includes

- f) intensively cultivating in plantations, any
 - (i) specialty wood crops, or
 - (ii) specialty fibre cropsprescribed by the minister;
- g) conducting turf production
 - (iii) outside of the agricultural land reserve, or
 - (iv) in the agricultural land reserve with the approval under the [Agricultural Land Commission Act](#) of the Provincial Agricultural Land Commission;
- h) prescribed types of aquaculture;
- i) raising or keeping fur bearing animals or game, within the meaning of a regulation made under the [Animal Health Act](#), by a person licensed or permitted to do so under that Act;
- j) [Repealed 2014-16-107.]
- k) processing or direct marketing by a farmer of one or both of
 - (v) the products of a farm owned or operated by the farmer, and
 - (vi) within limits prescribed by the minister, products not of that farm,to the extent that the processing or marketing of those products is conducted on the farmer's farm;

but does not include

- l) an activity, other than grazing or hay cutting, if the activity constitutes a forest practice as defined in the [*Forest and Range Practices Act*](#);
- m) breeding pets or operating a kennel;
- n) growing, producing, raising or keeping exotic animals, except types of exotic animals prescribed by the minister

Source: https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96131_01