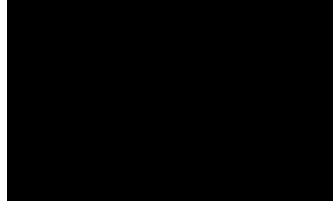


Mark Daniel



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Dear Islands Trust,

I am writing to provide feedback on the current draft of the 2026 Gabriola Official Community Plan (OCP).

My concerns relate to zoning classification changes and changes to the Land Use Bylaw (LUB) which would need to be enacted to be consistent with vague provisions concerning a “flexible housing policy” in the draft OCP, if adopted in its current form. These provisions would allow rezoning for additional dwelling units including “alternative housing” within a maximum floor area outside the defined freshwater hazard area. The areas where this could occur have not been explicitly identified but from a review of the defined freshwater hazard area one can see would be situated primarily in the centre of the island, in low-density areas now zoned Large Rural Residential. Draft OCP provisions allowing for and frankly encouraging significantly greater densification beyond current regulations constitute an unacceptable deviation from the 1997 Gabriola OCP that has well protected the social and natural character of Gabriola Island to date.

Let me say that I do not argue against a need to create additional housing for service industry workers. I do feel however that the perhaps well-intentioned but drastic changes proposed in the draft OCP stand to have negative impacts far beyond the threats that some would perceive now. There is an old adage about a need to be careful about intervening in ecological systems, because of unintended consequences that cannot possibly be foreseen at the outset. We need to heed this warning. Attempts to promote greater densification of Gabriola Island should mind that, at a given point, the creation of low-cost housing units will become incommensurate with what is required, creating a situation where new residents attracted by low-cost housing strain

existing services to the breaking point. Existing services will need to be intensified and services not currently required will need to be provided. New commercial opportunities will capitalise on greater numbers of people. Even more additional housing will become necessary, creating a self-perpetuating cycle of need-fuelling-need, and irreparable changes to the social and natural character of Gabriola Island. What kind of island do we seek to live on? A suburban extension of Nanaimo? I think not. The time to act is now, to apply sensibility and common sense.

I strongly object to the removal of the small and large rural residential designations in the 1997 Gabriola OCP. These provisions need to be retained in the draft OCP. The large rural residential designation provides substantial protections to the community, protections not dependent on bureaucratic provisions or social engineering. It preserves open space, the social character of the community, and wildlife habitats by providing clear guidelines on the maximum allowable buildings and floor space of a *single* secondary dwelling. I am appalled to imagine that Gabriola Island could see itself subject to a flexible housing policy like that which applies to the Mayne Island LUB. Mayne Island is very different from Gabriola Island. I take umbrage to unacceptable, gross lack of clarity in the draft OCP as to how a “flexible housing policy” would work in practice, including implementation and, especially, monitoring and enforcement.

The introduction in the draft OCP (2.4.3.6) of the proposed “Rural Residential” (RR) designation combining the current Small and Large Rural Residential designations does not define lot size for rural residential properties. Policy 2.4.3.6.2 specifies buildings allowable on lots 2+ hectares but not for properties that are less than 2 hectares. This policy must be clarified to make explicit the buildings allowable on lots of 2+ hectares and lots of less than 2 hectares. The “flexible housing policy” (2.4.3.6.3) is problematic as lot size is not defined and the maximum allowable number of buildings is not specified. I do not see that Policy 2.4.2.1.2. on flexible housing is particularly helpful in providing any clarification to Policy 2.4.3.6.3. Both flexible housing policies (2.4.3.6.3 and 2.4.2.1.2) as they pertain to rural residential properties are vague as to maximum allowable number of buildings, floor space, and lot size – essential considerations for policy, all undefined. Policy 2.4.2.1.4 is in fact grammatically incorrect and confusing: “... *permitting a secondary suite and a detached secondary units on lots larger than 2 hectares ...*,” leaving unclear if a single unit or plural secondary units is intended to be promoted.

I request elimination of the flexible housing policy from the rural residential designation, on the basis that it is so vague it opens the door to “Mayne Island type” bylaws which would destroy the social character of many rural residential neighbourhoods on Gabriola Island. People now living in rural residential areas made a clear choice to reside on Gabriola Island, based on their values, principles and desires. I would assert that “*a policy that is vague is no policy at all*” and can only lead to wildly variable interpretations and complications for all involved. If separate projects are needed to make explicit what is now unclear then such projects ought to have been done *before* proposing policies that are unduly vague as is presently the case.

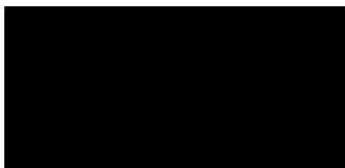
This is one reason why the flexible housing policy needs to be removed. It can be interpreted in many different ways, by many special interest groups, and stands to engender major inequity on this island. Certain residents with means will seize the opportunity to build additional dwellings

or install multiple tiny homes on their properties to become landlords, literally. Others not with means will be unable to do so. Areas of the island will change immeasurably, with variable levels of density across all areas. The reasons that brought people to reside on this island – peace and quiet, valuing of nature and tranquillity – will be compromised for all residents and for all time.

I am furthermore concerned that there is no plan for implementation – where is there evidence that the health department has been consulted as to biohazards and increased concentration of human waste from increased densification, and what of the need for attention to roadways that already cannot withstand damage from heavy trucks and traffic serving current development? I am similarly concerned there is no attention over enforcement around a flexible housing policy: the draft OCP passes the buck on enforcement to the Regional District of Nanaimo (RDN) where capacity for enforcement is unclear. It is imperative there be a mechanism for realistic, ongoing enforcement, beyond neighbours complaining about neighbours, to ensure compliance around density and zoning regulations. In my local area alone, there are already far too many violations around illegal dwelling units, including numbers of unapproved dwellings exceeding current by-laws, non-permitted septic systems, and outright dumping of human waste. It might be fine to impose a new policy, but one so lacking in tangible detail, unable to justify itself, is no policy at all and runs the risk of destroying the character of our island. That it might be well-intentioned is beside the point. It needs to evidence far greater thought than is currently the case. A policy that in essence says, “We’ll figure it out as we go” should not be included in the OCP.

I request that the Small and Large Rural Residential zoning designations be reinstated within the draft OCP, still to be voted on. I also request that all references to a “flexible housing policy” be removed at this time from the Rural Residential designation, until adequate research is done to investigate complications that appear not yet to have been considered by those promoting this plan. Such an initiative should be brought forward only in due time when adequate groundwork has been done to better understand the unintended consequences of such a dramatic initiative.

Sincerely,

A solid black rectangular box used to redact the signature of Mark Daniel.

Mark Daniel, BSc, MSc, PhD