

# OPEN LETTER – September 14, 2025

## From the Chairs of the CVRD Area I and Area F Advisory Planning Commissions

We, the Chairs of the Advisory Planning Commissions for Areas I and F, cannot support the September 3, 2025 draft of Official Community Plan (OCP) Bylaw 4373.

### **The current draft OCP is out of balance.**

It undermines rural lifestyles, worsens affordability, and places additional financial burdens on our communities. Once adopted, an OCP binds the CVRD to its policies — meaning rigid and unbalanced rules will shape ‘West Cowichan’ AREA I and AREA F for decades.

We call for a more balanced OCP — one that protects farmland and the environment while also supporting rural living, affordability, and the diversity of lifestyles that make our West Cowichan unique.

### **Key Concerns of Draft OCP Bylaw 4373**

#### **Rural Lifestyle & Land Use**

- Discourages further subdivision of rural lands outside Growth Containment Boundaries (GCBs).
- Reduces rural residential options and denies expanded opportunities for small hobby farms.
- Forces compact housing into Youbou and Honeymoon Bay, eroding lifestyle choice

#### **Housing & Affordability**

- Reduces housing options and affordability, increasing costs for both developers and residents.
- Developers have already warned the OCP will raise prices, create unsustainable parcel values, and worsen inventory shortages.
- Density restrictions and rigid land-use policies on existing rural parcels limit flexibility for families to create multigenerational housing, multifamily occupancy, and legacy planning. Instead of supporting extended family living and land stewardship, the OCP forces narrow housing formats that don’t reflect rural traditions or future needs.

#### **Community Impacts**

- Restricting rural residential growth accelerates aging demographics, drives youth away, reduces the local workforce, and weakens volunteer bases (e.g., fire/rescue).
- Blocks economic investment and creates equity concerns: while existing rural homes rise in price due to scarcity, raw rural land loses value when subdivision potential is removed.
- Generates social tension by marginalizing rural residents in favor of urban-focused planning.

#### **Taxes & Infrastructure**

- Growth limits cap rural land equity while GCB land gains value, shifting a larger relative tax burden onto rural residents.
- If projected development inside GCBs does not occur, taxpayers face higher mill rates, utility fees, and parcel taxes, along with stranded infrastructure costs and inefficiencies.

#### **Local Area Plans (LAPs)**

- LAPs in Schedule B fail to capture the unique needs of our areas and do not adopt APC recommendations.
- Rigid and restrictive OCP policies override LAPs aspirations, leaving local planning powerless.

#### **Out of place Municipal Policies**

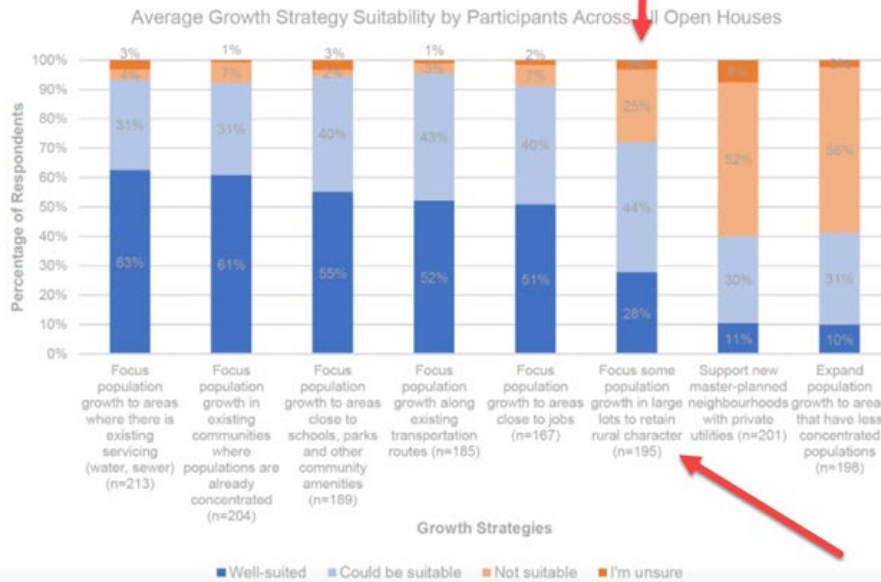
- Municipal Tree Bylaw Policy restricts rural property owners from managing trees on their own land, adding red tape, compliance costs, and undermining stewardship traditions.
- Wood Stove Policy phases out wood stoves, a common and affordable rural heating source, forcing reliance on costly alternatives and undermining rural self-sufficiency.

## What the Community Said



Item 6.3

Figure 2-3 Average level of suitability per growth strategy across all open houses.



Majority of respondents preferred to focus growth in areas where there is existing servicing and in existing communities.

WHAT WE ASKED FOR!

72% of the respondents wanted to focus some population growth in large lots to retain rural character. (Growth strategies - well suited or could be well suited)

COWICHAN VALLEY REGIONAL DISTRICT

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Area in hectares inside of the growth containment boundary

OCP Land Use Designation	A	B	C	D	E	F	G	H	I	CVRD
Large Lot Rural	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Small Lot Rural	0.0	10.5	0.0	0.1	0.0	0.0	0.0	0.0	0.0	10.6

WHAT WE GOT  
0% OF GROWTH IN  
LARGE OR SMALL  
RURAL LOTS

### Growth Strategy Preferences (CVRD 2020 Engagement):

Over 70% of respondents supported allowing some growth on large rural lots to retain rural character. The OCP draft, however, allocates **0% of growth inside the GCB to large or small rural lots** — showing a clear disconnect between community input and policy direction.

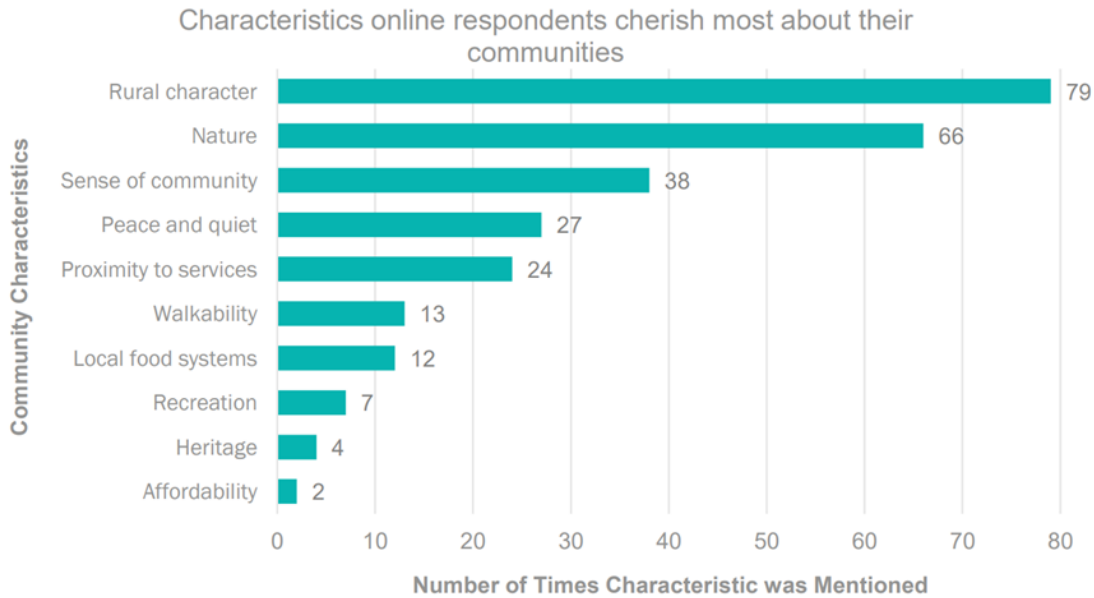
Furthermore, the OCP layers on many **policies that prevent any growth outside the GCB**, amplifying the imbalance between what residents asked for and what the plan delivers. Instead of balanced growth, the result is a rigid containment model that leaves rural communities behind.



### 3.8 Community Mapping

Online respondents strongly cherished the rural quality of their communities, with many speaking to the small town feel and wide-open spaces associated with large, rural lots. Respondents also felt that abundant green space, proximity to the ocean and access to nature was an important part of where they lived. Many spoke to the peace, quiet and tranquility associated with a rural lifestyle and proximity to nature. Some respondents enjoyed the easy, walkable access to services in their communities, all the while being surrounded by nature. There were no major themes that emerged by geographic area, age or income level.

Figure 3-10 Online respondents to the community mapping exercise.



Community Mapping (CVRD 2020 Engagement): Residents most cherished their rural character, nature, and sense of community. This reinforces that rural lifestyle is a top community value — directly contradicting OCP policies that limit rural residential growth and opportunities.

## Conclusion

Thanks to the leadership of **Director Morrison (Area F)** and the support of **Directors Abbott (Cowichan Bay), Acton (Shawnigan Lake), McClinton (Saltair), and Maartman (North Oyster)**, the draft OCP has been referred back for further debate. On **September 17, 2025**, the CVRD Special EASC will consider **231 recommended changes** to this “modernized” OCP — a plan that will guide land use for the next 20 years. Many of these changes reflect APC recommendations from Areas I and F, and we strongly support moving them forward.

We ask the directors, that you approach this debate by considering the OCP as a plan for the entire community. The goal of this document, as set out in provincial legislation, is to create a balanced approach to development. Decisions made for part of the region should not come at the expense of another's long-term well-being. The current draft is **out of balance**: it undermines rural lifestyles, worsens affordability, and places additional financial burdens on our communities. The recent **Victoria Roundhouse legal challenge** demonstrates the consequences of making decisions inconsistent with an OCP. Once adopted, an OCP binds boards decision-making; board members cannot make ad hoc exceptions without exposing the CVRD to potential legal challenges and costly litigation. A rigid, unbalanced OCP removes flexibility, stifles opportunity, and creates uncertainty for residents and investors alike.

Above all, there is **no urgent need to rush adoption** — the only urgency is to **get it right**. The decisions made now will shape our communities for decades and must be made carefully, correctly, and with balance. Adopting first and amending later is not a solution: amendments whether to approve projects or make significant changes require much the same bylaw process as a new OCP, with consultation, notice, and hearings. Major changes are just as costly, time-consuming, and contentious as drafting anew, while frequent amendments erode investor and community confidence. As the saying goes, *“Never time to do it right, but lots of time to do it over.”* Now is the time to do it right.

Finally, it must be acknowledged that the recommendations and concerns of the **Area I and Area F APCs** have been largely denied throughout this process, leaving our communities without meaningful representation in a document that will shape our future for decades. We call for a **balanced, practical OCP** — one that protects farmland and the environment while also supporting rural living, the natural progression of communities, supports affordability, and the diversity of lifestyles that make the CVRD regional districts unique.

Signed,

Stephanie Harper - Chair Area F Advisory Planning Commission

Joelle Belanger - Chair Area I Advisory Planning Commission