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To: Council
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Hello Mayor and Council,

I am writing with regard to the proposed Major Review of the Official Community Plan (OCP). I apologize for not having noticed the intent of this item on the December 2025 meeting agenda. I probably glanced at it and assumed it was related to the update of the OCP which had just been completed in that same month. I also apologize for the length and detail of this submission being submitted so close to the time when you'll be debating and approving or declining financing of the proposed Major Review of the OCP.

Scanning your "NEW INITIATIVE IMPACT ASSESSMENT" document, I see that council now considers the 2018 OCP review of Esquimalt's 2007 inaugural OCP more of a "major re-calibration" than a "major review". With all of the money, time, and energy invested by council, staff, residents and other stakeholders at the time, I doubt that anyone who participated in that process in 2018 believes it resulted in substandard or grossly inadequate guidelines that are now in need of a major rewrite. Council's current claim that the 2018 effort was a "major re-calibration" rather than a "major review" is tantamount to arguing semantics in order to prop up the notion that we need a completely new set of guidelines, or a new document.

Further updates to the OCP completed in 2025 ensure that the OCP is in compliance with the provincial government's 2023 Housing Supply Act, so why is it suddenly felt that major changes are needed? Our OCP is a comprehensive document and, as far as I can tell, the proposed studies contained in the New Initiative Impact Statement are either already embedded in the existing OCP, consist of gathering and analysis of data, and reporting out that is already normally performed by staff or, in the case of Road Urban Design Guidelines, is something the Township has already been actively engaged in for the past several years.

Maybe the Township does need to invest in software and training to assist staff with compiling the "Housing Needs Report" required under section 473.1 of the province's Local Government Act (information currently contained in section 5.1 of the OCP "Anticipated Housing Needs in the Next 5 and 20 Years"). That would be less expensive than what is being proposed.

Incidentally, section 473.1 of the Local Government Act speaks only to the requirement of council to receive a "housing needs report" when creating or updating an OCP, and to publish the relevant information in the OCP by December 31st of the same year. Nothing to do with how density bonuses for developers are triggered or anything else mentioned in the paragraph regarding Fiscal Impact

Analysis Model of Development Potential, which council claims are requirements under that section of the Local Governance Act.

With the township currently trying to wrestle the proposed 2026 property tax increase of 13% down to a single digit increase (anything over the equivalent of the current cost of living % increase plus maybe 1 or 2% to cover contingencies is unacceptable – but that’s another issue altogether), the last thing we need to be spending hundreds of thousands of dollars on is an unnecessary OCP review. I’m asking that you please abandon this Major Review of the OCP project at once.

If you choose to NOT abandon this unnecessary OCP Major Review project, I have further thoughts on what groups or individuals council considers stakeholders in Esquimalt in relation to formulation of the OCP. I see that Urban Development Institute (UDI) was consulted by the Township during the 2025 OCP update. It’s not surprising that you would consult them for that particular update since, having lobbied the provincial government for years, they were largely responsible for the creation and implementation of the province’s new Housing Supply Act. UDI is a powerful lobbyist organization (registered with the Registrar of Lobbyists of BC) whose membership consists almost entirely of businesses whose success depend on continued growth and expansion of the real estate development industry and other related industries.

I resent UDI having been elevated to “stakeholder” status in Esquimalt for the purpose of developing a new OCP. UDI is NOT a stakeholder in Esquimalt. They are a lobbyist organization – mostly for developers - and they do not deserve to be on equal footing with me and other legitimate stakeholders in Esquimalt. Legitimate stakeholders are in it for the long term. Developers, quite naturally, seek to maximize profit as much as possible, and then move on to other locations when they’re done. Certainly, UDI has a right to exist, and if any of their member companies are based in Esquimalt, they have the right to be considered individual stakeholders. One voice – not representative of thousands of voices.

If you continue with this OCP review and allow UDI’s continued “stakeholder” status, I certainly hope that you don’t plan to award any of its member companies or their subsidiaries the contracts to consult, or perform the studies or work you plan to carry out. The would be an obvious conflict of interest.

Having just now reviewed UDI’s Capital Region membership list, I see that the Township of Esquimalt is actually a member. How can you be both the objective, unbiased governing body of the township – meant to protect and advance the interests and wishes of the people who elected you - and a member of a lobbyist organization that you have now granted stakeholder status? Yikes!

Also, speaking of legitimate stakeholders in Esquimalt, why are we now considering surrounding municipalities stakeholders here? Sure, there’s mutual expectation to be good neighbours, and there should be consultation and coordination of major roadway upgrades for continuity and consistency (Active Transport Network planning, for example), but they are not stakeholders here any more than we are stakeholders in their areas. Having said that, I suppose Victoria could be a considered stakeholder in Esquimalt at this point in terms of anything that relates to policing here.

With the list of “stakeholders” having grown to such an extent that it now contains nearly double the number of groups it did in 2018, and especially if it includes a powerful lobbyist organization, the voice of one resident will be assigned less weight and perceived as a very small percentage of those whose input should be given consideration.

With words like “dynamic” included in council’s proposals that cover regulation of density and building heights – dependent on economic conditions for developers, etc, I feel like council would like to further relinquish their jurisdiction over decisions regarding both matters , and be able to throw up their hands and point out that whatever development is being proposed conforms with the OCP (like happened with the commercial/mixed use loophole at 900 Carlton Terrace). I believe that UDI is in no small way behind the push to make these changes. We’ve already got the provincial government imposing arbitrary housing quotas on us. We need to at least retain some control over how those new homes fit into our neighbourhoods.

As mentioned above, I would like council to abandon this proposed OCP Review.

Thank you for your consideration.

Susan Adams

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