

From: [Linda Young](#)
To: [legislativeservices](#); [Kate Segall](#)
Cc: [Sierra Acton](#); [Mike Wilson](#); [planning@cvr.bc.ca](#); [Linda Young](#)
Subject: [ADDENDUM] Re: Written Submission – Bylaw 4710 (Electoral Area A)
Date: Sunday, March 29, 2026 4:12:41 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Director Segall and CVRD Legislative Services,

Further to my previous correspondence regarding Bylaw 4710, I am requesting that the following three technical questions be addressed by staff and included in the official record for the upcoming Board/Committee deliberations:

- On Site-Specific Carrying Capacity: Given that Frayne Road is entirely reliant on private septic systems, how has the CVRD reconciled "standardized" urban density permissions with the physical carrying capacity of our specific soil types? Does the CVRD have a Cumulative Impact Assessment proving that the increased density allowed "by-right" under Bylaw 4710 will not lead to widespread septic failure or nitrate contamination of the underlying aquifer?
- On Reserve Field Protection: Provincial health regulations require rural lots to maintain a primary and a reserve septic field area. How does the standardized "urban-style" lot coverage and reduced setbacks in Bylaw 4710 ensure that homeowners do not inadvertently build over their only secondary septic site? Will the CVRD accept legal and financial liability if these new standardized permissions result in the loss of a property's only viable backup septic location?
- On Service Level Disconnect: Why is the CVRD applying "urban-style" zoning to the Frayne Road area when Provincial

Bill 44 specifically allows for exemptions in areas unserved by community sewer? What is the CVRD's justification for implementing a "one-size-fits-all" bylaw that creates urban density without the corresponding urban infrastructure (sewer/water) required to support it?

I look forward to a formal response on these points before the bylaw proceeds to further readings.

Sincerely,

Linda Young

Frayne Road, Mill Bay

On Sun, Mar 29, 2026, 8:16 a.m. Linda Young [REDACTED] wrote:

Please include this submission in the official record for consideration of Bylaw 4710.

Hello Director Segall,

I am writing as a resident of Electoral Area A (Mill Bay) regarding the proposed Comprehensive Zoning Bylaw 4710.

I am not opposed to modernization or alignment with provincial housing direction. However, I have concerns regarding both the process and the practical implications of this bylaw in rural areas such as Area A.

While I understand that Bill 44 removes the requirement for a public hearing where zoning is consistent with the OCP, that exemption depends on true consistency. Bylaw 4710 introduces new zoning structures, expanded permissions, and site-specific development frameworks that appear to extend beyond straightforward consolidation. Where new permissions or embedded development potential exceed what was reasonably contemplated in the OCP, reliance on the no-hearing provision warrants careful reconsideration.

In Area A, servicing constraints are a material factor that should be directly addressed. Many properties, including my own, rely on septic systems, and development in Mill Bay is already influenced by water availability limitations. Existing water systems in the area are fragmented, rely heavily on groundwater, and are managed through monitoring and seasonal restrictions rather than demonstrated surplus capacity. Planning work at the watershed level is ongoing, but this does not equate to confirmed infrastructure capacity to support cumulative increases in density or intensity of use.

In addition, available provincial and regional information identifies that land use—including septic systems—can influence water quality within the Mill Bay watershed. Expanding

zoning permissions without a corresponding assessment of cumulative servicing impacts risks creating a disconnect between land use policy and the physical limits of the environment.

It is also important to recognize that groundwater systems and watershed conditions are shared across the region. Sustainable management of these resources is a common interest for all communities in the area, including neighbouring jurisdictions such as the Malahat Nation, and requires a coordinated and cautious approach.

Finally, the introduction of detailed, site-specific zoning frameworks within a comprehensive bylaw reduces future opportunities for parcel-level scrutiny. Embedding development permissions at this stage shifts decision-making forward without the benefit of future public processes tied to specific proposals.

Given these considerations, I am requesting that the Board support deferral of Bylaw 4710 to allow for:

- Clear confirmation of consistency with the OCP at a detailed level
- A transparent assessment of servicing capacity in rural areas, including groundwater, septic loading, and fire protection implications
- Consideration of whether elements of the bylaw warrant separate processes with greater public input

This request is not about opposing growth or regulatory updates. It is about ensuring that changes of this scale are implemented in a manner that is infrastructure-aware, environmentally grounded, and appropriate for rural communities.

I would appreciate your position on whether you will support deferral or additional review prior to adoption.

Sincerely,

Linda Young

Frayne Road, Mill Bay