

From: [Lorraine Keen](#)
To: [legislativeservices](#); [Sierra Acton](#); [Zoning](#); [Chairperson](#); [Mike Wilson](#); [Hilary Abbott](#); [Alison Nicholson](#); [Ian Morrison](#); [Jesse McClinton](#); [Ben Maartman](#); [Karen Deck](#); [TimMcGonigle](#); [Deena Beeston](#); [mstaples@duncan.ca](#); [bruce.findley@northcowichan.ca](#); [Tek Manhas](#); [Christopher Justice](#); [Mike Caljouw](#)
Subject: Formal Opposition to Proposed R-1 Zoning Changes – Impact on Agricultural Rights
Date: Sunday, March 29, 2026 8:19:40 PM

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Dear Ms. Action, the CVRD Board, and policy makers at the CVRD,

I am writing to express my strong opposition to the proposed transition of my property from R-2 (Suburban Residential) to the new R-1 Residential designation. As the owner of a 2-acre parcel, these changes represent a significant loss of land-use rights and property value.

Specifically, I am concerned with the following:

- **Elimination of Agricultural Use:** The removal of 'Agriculture' as a permitted principal use represents a drastic and unjustified shift for parcels exceeding 2 acres. Replacing established agricultural rights with a restrictive 'Backyard Hen' policy is a functional down-zoning that ignores the scale of my property. A 6-hen limit on a 0.8-hectare lot is mathematically disproportionate and fails to recognize the land's natural carrying capacity. Furthermore, the requirement that poultry be confined to a run or building at all times—denying them the ability to forage on a 2-acre landscape—is not only unnecessary for noise or nuisance control on a lot of this size but is fundamentally inhumane and contrary to best practices for animal welfare.
- **Arbitrary Caps on Parcel Coverage:** The proposed cap of 750m² for parcel coverage is highly restrictive for larger lots. Under the current 30% rule, my property should allow for a much larger footprint. This "one-size-fits-all" cap unfairly penalizes those of us with larger acreages.
- **Increased Density via Setbacks:** Reducing rear setbacks to 1.0 metre encourages overcrowding and reduces the privacy and "suburban" character that the original R-2 zone was intended to protect.

My 2-acre parcel is significantly larger than the minimum lot size required for standard residential use. Applying 'small-lot' restrictions—such as a 6-hen limit and a 750m² coverage cap—to a property of this scale is a failure to recognize the diverse land types within the district. These restrictions ignore the natural capacity of larger R-2 parcels to support agricultural activities and accessory structures without impacting neighbours.

The proposed zoning amendments fundamentally strip away the agricultural viability of my property. I urge the CVRD to move forward with a public hearing to address the outcry from large-lot owners. It is imperative that you either revise these restrictions for parcels over 2 acres or implement a sub-zone that maintains our existing R-2 agricultural rights, ensuring that our land-use remains consistent with the scale of our properties.

Sincerely,

Lorraine Keen

Shawnigan Resident