

April 4, 2025

Mayor and Council,  
City of Langford  
c/o [dsametz@langford.ca](mailto:dsametz@langford.ca)

Re: DRAFT OCP

With over 30 years of experience of advising on, and advocating for the benefits of active transportation, Capital Bike is pleased to see the ambitious goals in the City of Langford's Draft OCP. Transportation infrastructure should be built for the benefit of all people (rather than cars), with safety and comfort as top considerations. The Draft OCP recognizes that transit, coupled with cycling, walking, and rolling infrastructure is more efficient at moving people, especially in a growing city.

In particular, we are encouraged by Part 5 of the Draft OCP titled "Mobility Choice, Not Car Dependency." This section aligns with Capital Bike's Roadmap for Cycling Success, shared with City of Langford in 2022. Our Roadmap advocated for establishing a long-term All Ages and Abilities network including protected bike lanes on all major roads and the busiest of residential streets, connecting to the front door of every school, and addressing gaps in moving between Langford and neighbouring municipalities.

We were impressed with the significant public engagement demonstrating support for bold targets, as people of all ages are looking for mobility options that make sense. We believe Capital Bike can be a valuable partner in helping Langford achieve its Draft OCP target of a transportation system that sees 42% of all trips made by walking, rolling, cycling, and public transit. Our education programs reach into many schools and organizations, and our popular Go By Bike Week events have celebrated bike riding as a normal everyday activity for over 30 years.

Active transportation projects are vital for climate action, public health, and equitable and affordable access to safe transportation. Moreover, they enhance quality of life and community well-being. Congratulations on the bold and forward-looking Draft Official Community Plan that recognizes that investments in community infrastructure yield long-term benefits and a stronger, more resilient City of Langford.

Sincerely,



Colleen Sparks, Executive Director  
Capital Bike (Bike Victoria Society)

cc.     Tori, Klassen Jeffery, Chair West Shore Local Committee, Capital Bike  
        Doug Baer and Joel Satre, Co-Chairs, Advocacy Committee, Capital Bike

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May 6<sup>th</sup>, 2025

Dear City of Langford Planning,

The City of Langford's OCP update presents a visionary and divergent approach to planning for equitable, prosperous, and sustainable development. The milestone of *100,000*, as opposed to year, places population—the people—at the centre of the plan rather than a quantitative, linear, and colonially-oriented measure.

The Community Social Planning Council of Greater Victoria supports the OCP's focus of complete communities and planning neighbourhoods which are inclusive and equitable. This means planning for residents of diverse age ranges, diverse priorities, and diverse modes of accessible transit (among other examples). The Land-Use and Growth Management Strategy provides an aspirational, yet realistic, approach to conceptualizing the development of complete communities. The "4Cs" concept of place hierarchy—City Centre, Urban Centres, Corridors, and Complete Communities (p. 27)—is a model that considers development for different uses and priorities. This model, improving connecting corridors between centres and promoting a more localized lifestyle, is the state of art trajectory related to planning not only in the Greater Victoria Region, but across the Province of British Columbia. Furthermore, the OCP's call for a "coordinated approach that strengthens and connects the policies and guidelines that make dense urban development successful" (p. 52) demonstrates the responsibility of city planning to be accountable to the desires and needs of citizens which are represented through council policy decisions. Additionally, it is important to value a coordinated approach that weaves together urban infill, transportation, land use, housing affordability, climate sustainability, and arts and culture—not as separate elements, but as interconnected and mutually reinforcing components of a vibrant and prosperous city. While consultation with local Indigenous Nations is outlined in the Desired Outcomes of Embracing the Creative City (p. 86), it would be to the benefit of all residents for the City to consult with Indigenous Nations in more of the Targeted Commitments. For example, a challenge related to Protecting Ecological Systems and Biodiversity is planning for long-term environmental stewardship. The Lekwungen-speaking Peoples are the original stewards of this land and until traditional Indigenous knowledge is meaningfully incorporated into planning processes, there remains a risk of perpetuating settler-centric approaches to land stewardship and the care of all its inhabitants.

The devotion of community engagement, reciprocal dialogue, and multi-modal avenues of feedback related to Langford's OCP update is exemplary and sets an important precedent in planning projects moving forward. All in all, the City of Langford's OCP update is a valuable advancement for Langford and its people, as well as the Greater Victoria Region as a whole.

King regards,

**Olivia Brodowski** (she/her)  
**Research Project Manager - Complete Communities Project**  
Community Social Planning Council of Greater Victoria  
Suite #216 – 852 Fort Street, The Joseph Building

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Subject:** Langford OCP Update  
**Date:** June 2, 2025 5:10:05 AM

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Hi Langford Planning,

I have two very specific points of feedback/questions regarding the new draft OCP.

1. In transportation, one of the action items says to continue to assess replacing BRT with LRT. This is good, however, I would love to see a little more ambition and have it expanded to say LRT or automated light metro akin to SkyTrain. Obviously the OCP is a minor element in planning a regional project, but considering the 95 in it's current mediocre state manages to get over 11,000 daily riders (and this does not account for rush hour only routes like the 61 or 47/48) and Langley justified getting a metro, we as a region should at least seriously consider the possibility. I think Langford is uniquely suited to lead that push.
2. Point 11.23 in economic resilience talks about establishing minimum commercial unit sizes. Have you done any analysis here about the negative impacts this could have on small local business? Bigger units mean higher commercial rents, and high commercial rents both kill existing small business, and make it harder for new businesses to begin. I am worried that by mandating minimum units Langford is going to inadvertently harm small business instead of encouraging them. Someone dreaming of starting a restaurant for example might only be able to afford a takeout window type of unit (See Mom's Kitchen and Ayo Eat in Market Square for examples of the format). I actually found a really nice bakery in Wuhan that was just a walk up counter to the sidewalk. It would be a shame if Langford prevented businesses like them from ever having the chance to begin.

I recognize amendments at this point may need to be may by council, but I figured I'd send this quickly anyway.

Thank you!  
Cord Corcese.

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Subject:** Opposition to the Proposed Official Community Plan (OCP) – Bylaw No. 2200  
**Date:** May 28, 2025 10:17:24 PM  
**Attachments:** [Opposition Letter OCP Langford.pdf.pdf](#)

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Dear Mayor and Council,

I am writing to formally express my opposition to the proposed Official Community Plan (OCP) currently under review by the City of Langford.

While I recognize the need for long-term planning to accommodate growth, I have significant concerns regarding both the direction and implications of the current proposal.

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### **1. Overconcentration of High-Rise Development**

The allowance of buildings up to 30 storeys in the City Centre and up to 24 storeys in Urban Centres represents a dramatic shift in density. These high-rise developments may:

- Strain local infrastructure (sewer, water, roads, emergency services).
- Alter the character of existing neighbourhoods without adequate transition zones.
- Create shadows and wind tunnels, reducing livability and comfort at street level.

This scale of vertical growth seems disconnected from the preferences of many residents who value human-scale development and green spaces.

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### **2. Insufficient Road Infrastructure and Traffic Planning**

Despite ambitious modal shift goals, Langford remains largely car-dependent. The OCP sets a target of 42% non-vehicle trips, yet lacks a clear, funded implementation timeline for:

- Expanding transit service levels.
- Building separated bike infrastructure city-wide.
- Addressing current traffic bottlenecks on roads like Jacklin, Sooke, and Goldstream.

Without serious upgrades in transit and road infrastructure, this plan risks compounding congestion, not relieving it.

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### **3. Weak Protections for Established Neighbourhoods**

The infill strategy, while framed as sustainable, could lead to:

- Increased densification in stable, single-family areas.

- Displacement of long-term residents.
- Loss of mature trees, green space, and neighbourhood identity.

Planning for “Complete Communities” should be more localized and tailored — not top-down overlays that prioritize density over stability.

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#### **4. Lack of Binding Commitments**

While the OCP sets broad targets on climate action, equity, and housing, it lacks:

- Clear timelines and accountability mechanisms.
- Legally binding guarantees for affordable housing, not just density.
- Public engagement on key implementation tools (e.g. zoning bylaw changes, density bonusing rules).

This leaves too much up to future policy decisions, creating uncertainty for residents.

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#### **5. Healthcare and Community Services Lag Behind**

The plan mentions population growth up to 100,000 residents, yet it does not adequately account for:

- New health care facilities and service expansion.
- School capacity.
- Local food access and resilience planning.

Growth should not outpace essential public services — especially in a city already facing healthcare accessibility issues.

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### **Conclusion**

I urge Council to reconsider the scale, speed, and structure of this OCP. While I support planning for a better future, we must do so cautiously, equitably, and with deeper public engagement.

I request that this proposal be sent back for revision with further community input and stronger safeguards for infrastructure, affordability, and quality of life.

Sincerely,

Hossein Reyhani

HRS

Protecting the environment is a respect for the future.

April 30, 2025

City of Langford

2<sup>nd</sup> Floor, 877 Goldstream Ave  
Langford, B.C. V9B 2X8

by email: [planning@langford.ca](mailto:planning@langford.ca)

**Re: City of Langford - Official Community Plan Refresh**

Thank-you for the opportunity to review the City of Langford's draft Official Community Plan (OCP) from a population health perspective. Through collaboration with communities, Island Health's Population and Public Health teams seek to support the creation of adaptive and vibrant communities to improve population health outcomes and reduce health inequities. The update to Langford's OCP presents a key opportunity to set the foundation to support better health and well-being for current and future residents as the community grows.

The [Healthy Built Environment Linkages Toolkit](#)<sup>1</sup> provides an evidence based framework which links community design, planning principles and health outcomes across key built environment features. The draft OCP integrates key planning principles which are aligned with creating healthy built environments and would be expected to positively influence a number of social and environmental determinants of health. These include:

- **Complete, compact, connected neighbourhood design** – The plan's emphasis on mixed land use with compact urban form, through multi-modal infill development, and increased connectivity promotes active modes of travel and supports access to key destinations (e.g. schools, employment, recreation, services) by reducing travel distance. This type of design promotes physical activity, reduces reliance on vehicles and provides opportunity for social connection.
- **Prioritizing active and public transportation through safe, accessible, attractive networks** – Separated transportation networks that protect the safety of the most vulnerable road users (those outside the automobile) are critical to reduce serious trauma and death. Active transportation infrastructure also promotes health through increased physical activity, improved

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**Island Health Medical Health Officers**

Chief MHO: Dr. Réka Gustafson 250-519-3406; North Island: Dr. Charmaine Enns 250-331-8591

Central Island: 250-739-6304; Cowichan Region: Dr. Stéphane Trépanier 250-737-2020

South Island: Dr. Murray Fyfe, Dr. Dee Hoyano, Dr. Christina Kay, Dr. Mark Cachia, Dr. Mike Benusic 250-519-3406

[islandhealth.ca/about-us/medical-health-officers](https://islandhealth.ca/about-us/medical-health-officers)

mental health, and increased opportunities for social connection. Additionally, transportation networks which prioritize active and public transportation are critical to improving equity and access to key destinations and daily needs for those who may not own vehicles or be able to drive and rely of these modes of travel.

- **Enhancing nearby access to green spaces and integration of nature** – Access to parks, greenspace and natural environments has been associated with reduced stress, improved mental well-being and increased social well-being. The protection and expansion of parks and natural areas are particularly important with increased density as the community grows and to support climate resilience. Health equity is supported in the plan through prioritization of new parkland acquisition in under-served and low equity neighbourhoods and tree planting in identified areas of low tree equity.
- **Affordable and diverse housing options** – Housing is a key determinant of health. The plan's focus on a range of housing types, tenures, and affordability levels with key areas of housing need prioritized can help to address inequities and reduce health risks linked to housing instability. Accessible, adaptable and universal design feature helps ensure that people of all ages and abilities can live and thrive in Langford, which is essential for inclusive and equitable communities.
- **Promoting local food security and equitable access to affordable, healthy foods** – Policies in the plan which preserve agricultural land and support local food security initiatives such as food programs, community gardens, and farmers markets support healthy food systems. These policies will help enrich the local food knowledge base, preserve food sources that can increase the amount of local food production and help improve health outcomes, as people gain access to healthy local grown food. Additionally, the focus on encouraging neighbourhood grocery stores or markets within walking distance will further facilitate access to affordable and healthy food options.
- **Fostering social wellbeing and cohesion through neighbourhood design and public spaces** – Sense of belonging and social connectedness have significant impacts on our physical and mental health. The importance of healthy social environments is clearly recognized and promoted in the plan through the *Parks, Places and People* section with dedicated targets and commitments. Social connection is also promoted through the policies which support enhanced connectivity, active transportation and access to greenspace.

#### **Recommendation:**

- **Children and Youth** – Recognizing the critical physical and mental health benefits associated with play and social connection for children and youth, consider adding policy and a target/commitment with specific focus on ensuring nearby safe, connected, accessible green spaces and amenities (indoor and outdoor) for children and youth to play and connect.



Overall, it is evident that community health and factors that determine health have been strongly considered in the development of the plan and integrated in the desired outcomes, policies, targets and commitments. Island Health would welcome the opportunity for continued engagement and partnership with the City of Langford through provision of available health data, evidence and input that could inform the implementation phase of the updated OCP and related plans and strategies.

Yours Sincerely,



**Murray Fyfe, MD, MSc, FRCPC**

Medical Health Officer, South Island

Cc Jana Cranch, Healthy Built Environment Consultant, Island Health

Reference:

1. Healthy Built Environment Linkages Toolkit. Accessed September 24, 2024. <http://www.bccdc.ca/health-professionals/professional-resources/healthy-built-environment-linkages-tool>

**From:** [Blair Robertson](#)  
**To:** [Leah Stohmann](#)  
**Cc:** [Matthew Baldwin](#); [Warren Robertson](#)  
**Subject:** OCP Refresh Comments  
**Date:** April 6, 2025 10:11:47 PM

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Hi Leah,

Thank you for hosting the briefing last week. Please find below our company's response to the OCP refresh.

**Re: Opposition to the Designation of Future Policy Area in the Draft Official Community Plan**

We are writing to express our opposition to the proposed designation of our lands on Humpback Road as Future Policy Areas in the draft Official Community Plan (OCP) for the City of Langford.

As long-time local landowners and developers in Langford, we have actively contributed to the city's housing supply, infrastructure, and economic development over several decades. This change in OCP designation significantly impacts us and undermines the ability of committed contributors like Totangi Properties to continue playing a meaningful role in Langford's growth.

While we recognize and support the City's intent to manage growth responsibly, the current designation fails to acknowledge the critical opportunity these lands present—particularly their proximity to employment areas and major transportation corridors such as the provincial highway. These lands are ideally located to support a range of uses that align with the City's objectives, including housing close to jobs, or even employment-based uses themselves.

If the City's preference is not to consider these lands for residential development in the near term, then a more flexible policy approach should be taken to allow them to contribute to Langford's economic goals in other meaningful ways. These areas could serve as future employment lands, such as light industrial or business park uses, given their strategic location. Alternatively, allowing interim or temporary uses would support economic activity while broader development is deferred. Beyond and in the absence of these alternate planning considerations, we will continue to manage the land as managed forest and for forestry related uses.

The blanket deferral of lands under the Future Policy Area designation effectively freezes them from other land uses for 15 to 20 years or more, removing the ability for us to contribute to the City's growth or derive reasonable other use or value from our property. This has a devaluing effect and places an unfair burden on those who have long invested in and maintained these lands in good faith.

More specifically, the change in designation and resulting downzoning has a direct and negative impact on land value and access to financial capital. The uncertainty and long-term

deferral reduce the appraised value of the land, making it difficult to maintain access to financing secured by these lands. As a result, our ability to secure capital—whether for new housing projects, infrastructure investments, or other development initiatives in Langford—is severely constrained. This limits not only our own activity but also the pace at which the city can realize its housing and economic goals. When long-time contributors are restricted in this way, the entire development ecosystem is impacted.

We respectfully urge the City to reconsider the Future Policy Area designation. At a minimum, the policy should be revised to allow for near-term consideration of compatible non-residential uses and interim economic activity. A more flexible, case-by-case planning approach would balance the City's long-term goals with the immediate realities and opportunities of today, while also respecting the rights and contributions of existing landowners.

Thank you for your consideration. We would welcome the opportunity to discuss this matter further.

Sincerely,

Blair Robertson  
Totangi Properties



City of Langford  
2<sup>nd</sup> Floor, 877 Goldstream Ave.  
Langford, BC V9B 2X8

April 6, 2025  
*via email*

Attn: David Sametz, Senior Planner – Long Range Planning

**RE: Draft OCP Refresh – Westhills Feedback**

Dear Mr. Sametz,

As requested during a recent engagement session with city staff and its consultant (Brent Toderian), Westhills wishes to submit its feedback on the City of Langford's Draft OCP Refresh. In general, we feel this is a strong document which strikes a reasonable balance between previous commitments, current realities, and future aspirations. Accordingly, our comments are limited to only three items at this time:

**1. Pre-Committed Growth**

We appreciate the clear acknowledgement of pre-committed growth areas and their important role in meeting key OCP objectives, including targets for new housing and public amenities. Projects like Westhills are predicated on long-term municipal partnerships and require significant early investment to realize their full potential. Accordingly, we support the draft OCP position of preserving all current CD3 zoning and Development Agreement parameters, including building heights, densities, and land-use designations.

**2. Parking**

The draft OCP makes frequent references about the reduction or elimination of parking minimums. We fully support this policy direction and encourage the City to take a strong stance on applying this lever to accelerate mode shift via the built environment. The capital costs of excessive parking can and should be deployed to more beneficial outcomes which both improve new projects and better align with the City's long-term objectives & constraints. We understand these requirements will be specified in forthcoming transportation plans and bylaw amendments.

**3. Townhomes with Suites**

Consistent with the goal of providing a diversity of housing types, townhomes with secondary suites could fill an important gap in the attainable housing market. We recognize the City wants to avoid certain unintended consequences of this housing typology, but we feel these risks can be collaboratively addressed and the new OCP should at least offer policy support for this exploration.

Sincerely,

Kyle Taylor

cc. Leah Stohmann, Director of Community Planning & Climate Change

**To: Langford Mayor and Council**

City of Langford  
877 Goldstream Avenue  
Langford, BC V9B 2X8

**Subject: Letter of Support for the Draft Official Community Plan**

Dear Mayor and Council,

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I am writing to express my strong support for Langford's Draft Official Community Plan (OCP). This comprehensive and forward-thinking document clearly reflects the city's commitment to thoughtful urban planning, innovation, and sustainability, especially in addressing one of the most pressing issues facing our region: the housing crisis. It also aims to improve on sprawl which we find very impressive the thought that went into that.

Langford has long been recognized as a leader in proactive development strategies, and this new OCP continues to build on that reputation. The emphasis on increased density—particularly around transit corridors and urban centers—is not only timely, but absolutely necessary. As the population continues to grow and housing affordability reaches critical levels across Greater Victoria, it is essential that municipalities like Langford continue to show leadership by making room for a diversity of housing types, tenures, and income levels.

The Draft OCP wisely prioritizes infill development, mixed-use communities, and compact urban form, which will help reduce urban sprawl, support efficient public transit, and create vibrant, livable neighborhoods. These policies also play a key role in climate resilience, by limiting car dependency and protecting natural areas on the urban fringe.

Langford's bold and strategic planning approach continues to set the pace for other communities. By welcoming growth while maintaining a strong vision for sustainability and livability, Langford is proving that rapid development and responsible community building can go hand-in-hand.

Thank you for your dedication to a well-planned future, and for your efforts in engaging the public throughout this process. I encourage Council to adopt the Draft OCP and continue to lead by example in addressing housing needs with creativity, compassion, and long-term vision.



**Kyle Velikovsky**

Owner

White Wolf Homes

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[250-888-8209](tel:250-888-8209)



[kyle@whitewolfhomes.ca](mailto:kyle@whitewolfhomes.ca)



[www.whitewolfhomes.ca](http://www.whitewolfhomes.ca)

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Subject:** Input "Let's plan Langford for 100,000" public hearing June 25  
**Date:** June 13, 2025 12:54:41 PM

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Dear Members of the City Council,

I am writing to express my deep concern about the proposed increase in housing—both homes and apartments—within Langford. While I recognize the need for housing to accommodate a growing population, I believe it is unwise to proceed with further residential development without first addressing our already overburdened infrastructure, particularly the traffic situation.

Our roads and transit systems are currently struggling to handle the existing volume of vehicles. Daily congestion, delays, and safety concerns are becoming increasingly common, affecting quality of life for residents and undermining the efficiency of local businesses and services.

Adding more housing units without a solid and realistic plan to expand and upgrade our transportation infrastructure will only worsen these problems. We risk creating a situation where residents are frustrated, emergency services are delayed, and long-term growth is hampered by short-term planning.

I urge the council to take a more holistic approach—prioritizing traffic flow, public transit capacity, and road maintenance—before approving further housing developments. Sustainable urban growth depends on infrastructure that can support it.

Thank you for your time.

Sincerely,  
Anton van de Kar  
[REDACTED] Langford

**From:** [REDACTED]  
**To:** [Mayor Goodmanson](#); [Kimberley Guiry](#); [Colby Harder](#); [Mark Morley](#); [Lillian Szpak](#); [Mary Wagner](#); [Keith Yacucha](#)  
**Cc:** [Langford Planning General Mailbox](#)  
**Subject:** Draft OCP  
**Date:** June 2, 2025 10:01:59 AM

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Dear Mayor and Council:

I write to express my deep disappointment with certain elements of the proposed revisions to the Official Community Plan.

My most serious concern continues to be with the lack of protection for Langford's lakes and their surrounding areas. Langford Lake is already suffering from serious construction run-off that is not being addressed. There are fewer ducks and other wildlife on the lake and fewer small fish near the shores. The proposed increases in density will ultimately kill the lake - the jewel in Langford's crown which is always featured in every glossy brochure! Why not carve out protected areas? Why not impose a moratorium on multi-family and/or high-rise developments? Why not reduce the proposed tower development approvals and meet any court challenges just like White Rock did successfully a couple of years ago?

My second most serious concern is with the ridiculous maximum heights being proposed. The CRD is not in need of 24+ story buildings and a reduction in approved heights should be applied. The OCP speaks to thoughtful development but appears to funnel everything into high density towers or cramped townhouses. Where are the single family homes with a bit of space? Where will people who wish to downsize from existing large, multi-story homes but do not wish to belong to a strata find a small, single story house? Where is the City's pushback against some of the proposed developments? If Oak Bay and some of the other municipalities in the Greater Victoria area can limit developers, slow the pace and insist on more from them, Langford which has over-achieved for years should also be able to slow down. Residents are asking for more setbacks, less height and more greenspace but what is permissible continues the rampant over-development for which the previous mayor and council lost their bid for reelection.

I urge you to amend the proposed OCP to protect the lakes and to reduce the height maximums to increase the liveability of this City. Thank you for considering my comments.

Barb MacDonald

[REDACTED]  
Langford, BC V9B 4G3  
[REDACTED]



## Julie Coneybeer

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**From:** Julie Coneybeer  
**Sent:** May 26, 2025 12:21 PM  
**To:** [REDACTED]  
**Subject:** RE: 20250524 - Loris Rae re feedback on proposed OCP

Hello Loris Rae,

Your email to the City of Langford has been received and your comments will be forwarded to Mayor and Council for their information.

Best Regards,

**Julie Coneybeer**

Executive Assistant

**City of Langford**

† 250.478.7882 x4204

Please review our email privacy policy at [langford.ca/privacypolicy](https://langford.ca/privacypolicy)

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**From:** dev@eclipse3sixty.com <dev@eclipse3sixty.com>  
**Sent:** May 24, 2025 9:51 AM  
**To:** Langford Council <council@langford.ca>  
**Subject:** 20250524 - Loris Rae re feedback on proposed OCP

### Topics

Mayor and Council

### Name

Loris Rae

### Phone

[REDACTED]

### Address

[REDACTED]

Victoria, British Columbia V9B 0K3  
Canada  
[Map It](#)

### Email

[REDACTED]

### Message

To Mayor and Council,

I was unaware when the survey on the proposed OCP came out and missed the deadline.

I am writing this morning to have my voice heard. I am particularly alarmed to hear a tower near Langford Lake is being proposed. I have watched the health of the lake deteriorate over the years with all the nearby construction and what is currently needed is preservation efforts, not harmful, large-scale construction.

When I voted for this council, it was a vote against environmentally irresponsible development.

Sincerely,  
Loris Rae

**From:** [Bilston Watershed](#)  
**To:** [Mayor Goodmanson](#); [Kimberley Guiry](#); [Colby Harder](#); [Mark Morley](#); [Lillian Szpak](#); [Mary Wagner](#); [Keith Yacucha](#); [Darren Kiedyk](#); [Matthew Baldwin](#); [Leah Stohmann](#); [Langford Planning General Mailbox](#)  
**Subject:** Submission regarding OCP refresh  
**Date:** March 13, 2025 4:51:28 PM

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**To: City of Langford Mayor and Council, Chief Administrative Officer, Director of Planning, and Director of Community Planning and Climate Change**

I am writing on behalf of the Bilston Watershed Habitat Protection Association (BWHPA). Thank you for the opportunity to participate in the Langford Official Community Plan Refresh/Rethink process.

An Official Community Plan (OCP) serves multiple functions. While it is a policy document intended to manage growth and guide future development, it also clarifies the community's vision for the future.

The Bilston Watershed Habitat Protection Association (BWHPA) has conducted numerous community outreach and engagement sessions over the past years. We have heard a strong and consistent desire from Langford residents to see development carried out in ways that protect and enhance functioning ecosystems. This is confirmed by many comments in the summary of phase 1 of the engagement process.

Therefore, BWHPA encourages you to be bold in the refresh of Langford's OCP and to acknowledge growth management as an important environmental protection tool, as recommended in the Green Bylaws Toolkit. (The 3<sup>rd</sup> edition is available on the Stewardship Centre for BC's website <https://stewardshipcentrebc.ca/green-bylaws-toolkit/> )

Most of the Official Community Plan Bylaw Provisions recommended in the Green Bylaws Toolkit will directly or indirectly protect and enhance surface water and groundwater quality and quantity. We would like to highlight those that are essential to protecting water quality and quantity in Langford watersheds, and encourage you to consider the following specific protections.

**Cluster Development Away from Functioning Ecosystems:**

- a. Any new development should be treated as an opportunity to protect biodiversity corridors and ecological features. Clustering that strictly limits the footprint of development on the landscape is one of the most effective tools to maintain designated ecosystem services such as enhanced riparian corridors, greenways, groundwater recharge areas and sensitive ecosystems.
- b. Direct a large percentage of new development into existing urbanized areas.
- c. Create incentives for landowners to maintain ecological values on private lands.
- d. Consider downzoning greenfield sites that have significant riparian or environmental attributes to ensure they retain their ecological value.

**Develop integrated watershed management plans that:**

- a. Coordinate land-use activities and account for cumulative effects.
- b. Ensure the maintenance of functional ecosystems.
- c. Strengthen riparian area, streamside, and watercourse protection measures to preserve water quality and quantity, increase ecosystem connectivity, preserve biodiversity, maintain ecological services, mitigate impacts of change in land use and maintain more resilient ecological functions.

- d. Include comprehensive integrated stormwater/rainwater management planning.
- e. Identify networks of ecosystems that exist within the watersheds.
- f. Identify isolated ecosystems and establish corridors, connections, and linkages with larger ecosystem networks.
- g. Discourage fragmentation of contiguous ecosystems and ecosystem components
- h. Make detailed maps of sensitive ecosystems publicly available.
- i. Minimize the amount of impervious surface and encourage groundwater recharge using rainwater management based on infiltration, vegetated swales, and pervious paving material.
- j. Prohibit the discharge of unmanaged stormwater into watercourses along roadways and in urban areas generally.
- k. Require all public surface parking areas to be planted with a minimum of one tree every six spaces and to incorporate vegetated islands set below pavement grade and landscaped to provide bioretention and conveyance of parking lot runoff.

### **Watercourse/Wetlands Conservation**

- 1. Acknowledge the growing awareness of the ecological significance of wetlands for flood protection, water filtration and storage, groundwater recharge, thermal regulation, carbon sequestration and habitat.
- 2. Ensure that any activities and developments in a watershed that is connected to wetlands by hydrology or habitat do not negatively impact the health of wetlands and their functions.
- 3. Establish integrated rainwater management policies that maintain the natural hydrology and natural environment of watersheds, groundwater, streams, and other waterbodies, including provisions that ensure the maintenance of minimum base watercourse flows.
- 4. Enact or amend a watercourse protection or environmental bylaw that prohibits or restricts anyone from polluting or obstructing or impeding the flow of a stream, creek, waterway, watercourse, wetland or ditch and that imposes penalties for contravening the bylaw.
- 5. Require all streams to be maintained in an open state (not enclosed or covered over in a culvert or other engineered material).
- 6. Adopt a policy that limits the crossing of watercourses.
- 7. In cases where watercourse crossing is necessary, prioritize oversized culverts, clear span bridges or other infrastructure that causes minimal disruption to wildlife habitat and movement patterns.
- 8. Establish a program to remove existing obstacles that impede the movement of fish, such as inappropriately designed culverts and watercourse crossings.
- 9. Study the feasibility of “day-lighting” watercourses that have been enclosed.
- 10. Provide incentives to protect sensitive ecosystems, e.g. increased density on the balance of the subject property, an amenity bonus for another property, trading land, purchasing land, offering grants-in aid, or granting tax exemptions.
- 11. Exempt eligible riparian property from property taxes if a property is subject to a conservation covenant registered under section 219 of the Land Title Act.

### **Water Quality**

- 1. Protect water quality through best management practices for land development.
- 2. Require the use of vegetated waterways, swales, engineered wetlands or other biofiltration measures in addition to oil/water separators and catch basins, to more effectively filter pollutants before they can enter surface water and groundwater and in

particular, to prevent the movement of road salts and other contaminants into sensitive habitats.

3. Establish a maximum percentage of lot area that can be covered by impermeable material, particularly adjacent to sensitive ecosystems.
4. Establish standards for drainage works for the ongoing disposal of surface runoff and stormwater from paved areas and roof areas during and after construction to maintain natural runoff volumes and water quality.
5. Require comprehensive erosion and sediment control plans before construction begins.
6. Require the construction and stabilization of runoff management systems at the beginning of site disturbance and construction activities.
7. Minimize disturbed areas and the stripping of vegetation and soils, particularly on steep slopes.

### **Encourage stewardship awareness**

Develop stewardship awareness programs in cooperation with senior governments, local conservation organizations, and schools, to increase public awareness and support for conservation of sensitive and important ecosystems as well as ecosystem connectivity, and to promote active stewardship and restoration activities.

Support and encourage individuals and community organizations to be involved in managing natural areas, restoring and enhancing native habitats, planting native vegetation and appropriate trees and grasses, preventing erosion, and installing signs to inform and educate the public.

### **Create and track indicators of ecological health directly related to water quality and quantity including:**

- Kilometres of healthy riparian ecosystems
- Decrease or increase in total landscape imperviousness
- Water quality and quantity at specific sites in designated creeks and wetlands
- Decrease or increase in groundwater recharge areas
- Water flow-rates in specific wells over time
- Species at risk protected or lost

We appreciate the opportunity to provide input in this process. Thank you for considering our perspective.

Best regards,

Alison LeDuc

Bilston Watershed Habitat Protection Association president

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Subject:** OCP Train Infrastructure  
**Date:** May 20, 2025 10:22:26 PM

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Hello!

My name is Jesse Campbell, Langford resident, speaking to the OCP (5.1)

I was in attendance at tonight's (May 20th, 2025) Community Council Meeting and wanted to express my gratitude towards everyone who is working hard to build a better Langford for all. This was my first time attending a Community Council meeting and I left with a renewed passion for our evolving community efforts (like the new community garden!) and an excitement to see my home of Langford grow over the next many years.

To expand on the discussion of future transit options in and around Langford--in regard to having less car congestion, a more walkable Langford, and an expanded, safer bike system--I simply wish to voice my hope that Langford will support the redevelopment of future train infrastructure and aid the growth of the island rail corridor; connecting Langford to the rest of Vancouver Island and the greater Victoria area. Not only bridging residents to work, recreation, and more housing options, but also a huge source of future tourism.

Will future development of the OCP support expanding train infrastructure through Langford to connect us to the rest of the island?

Is there any plan to make Station Avenue a train stop/transit hub for Langford residents? (There was the briefest mention of a "light rail" system in tonight's presentation--which was exciting: I wondered if this was in reference to a tram type system along Langford Station/Station Avenue, to connect greater Langford?)

I believe Langford is becoming one of the most desirable places to live on Vancouver Island, and I dream of the day a train can provide alternate means of transportation up and down Vancouver Island; not only removing cars from the roads but also decreasing the need for expanded parking (designating that land for more multipurpose infrastructure, parks/community gardens, recreation centres, etc).

Thank you kindly for your time, I really appreciate it.

Jesse Campbell

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Cc:** [Mayor Goodman](#)  
**Subject:** OCP review  
**Date:** May 20, 2025 3:50:58 PM

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Please see attached feedback I sent in March to mayor and council with respect to the tower heights proposed in the updated OCP. Despite conversations with council members, my concerns remain unchanged and the arguments presented in their favour have not convinced me of their necessity. I wish to register my opposition to this portion of the OCP and suggest that lower heights are proposed instead.

Sent March 23:

[REDACTED] wish to express some concern about the OCP plans with regards to building height for proposed apartment blocks and the proliferation of 6 story buildings and higher in the downtown core.

[REDACTED] are very concerned that, while densification of the core is desirable, council may be losing sight of who is living in the proposed housing and [REDACTED] are concerned that provincial housing targets are making planning decisions to be more short sighted than would be wise.

[REDACTED] think there needs to be more consideration with respect to what kind of places people actually want to live in. The number of new apartments that are still for sale months after they've been built (Winster Court, Granderson, Millstream Rd) suggests that stuffing the core with apartment blocks might satisfy provincial targets but not actually the people who want to live in our community. There needs to be more consideration for who housing is being built for rather than blindly meeting targets and helping developers get maximum \$ per square foot. And [REDACTED] say this as people who lived in one of the newer apartment blocks with small children (Peatt Commons). If they're not being built with all kinds of residents in mind, including families, then what, honestly, is the point if not to check a box for the provincial housing targets or to satisfy developers and their associated realtors and mortgage advisors who stand to gain by more individual units?

[REDACTED] think more consideration needs to be addressed towards development and revitalization of brownfield sites that enhance our environment and build community rather than lots of apartment blocks that foster a more transient population who are just waiting in an apartment until they can buy a house. [REDACTED] would encourage council to look to housing in other countries that use smaller footprints to achieve density such as terraced housing in the UK or attached condo housing in cities such as Cambridge MA.

[REDACTED] have been staunch supporters of you all and our spent a significant amount of time on your election campaigns believing that you weren't going to do something like this. [REDACTED] are struggling to express just how disappointed [REDACTED] are to see these proposals. The idea of walking down Goldstream Ave in the shade of 30 story buildings, unable to see the trees of the land beyond sounds absolutely awful.

With all the evidence of heat islands in our downtown core, is this really the best we can do? Build more and bigger?! [REDACTED] feel incredibly let down by this aspect of the plan and I encourage you to take it back to the drawing board and plan for a liveable community that focuses on homes, not apartments that all too often reflect personal investment portfolios or holding patterns."

Sent March 25:

"Thank you for your email. I am glad to hear that these concerns are being heard and listened to.

I do remain concerned that were these building heights to remain in the plan, there would be little to stop them from coming to fruition in the future and that is not what I would want to see for Langford. I think we ought to be taking the heat island data very seriously and these building heights included for the downtown core in the draft are greatly at odds with this.

I think the OCP should reflect what we want Langford to look like regardless of the time period involved and

therefore my concerns remain so I would not be reassured by the idea that just because it may not happen in the next decade doesn't mean that it won't. I am also wary that the current provincial administration is influencing our OCP in terms of housing numbers and densification. Their housing strategy and demands could change at short notice depending on political factors, migration trends etc and so I am wary that a current demand that is less than a year old be worked into a plan that is intended to last beyond that of an administrative term.

I am always open to discussing planning further and specifically the OCP, but when it comes to building height, I remain firm in my informed opinion that the draft OCP currently presents a vision of Langford's downtown core that is far from desirable. What I see in the draft OCP would, I believe, ruin our city. With respect, we do not live in Coquitlam, and I'm not sure the parallels are accurate for various reasons. "

Sent March 30, 2025:

"I have spent a few days thinking about what you have said in your email and while I understand your point of view I remain unconvinced by it as I will explain. You explain the need to densify Langford's core but your explanation only works if Langford is looked at in isolation from the rest of the CRD.

We do not need this density in Langford's core but rather in the core of the Greater Victoria Metropolitan area or the CRD. The challenge for Langford's growth is influenced by the policies of the other municipalities who have been happy for Langford to grow so that they don't have to. This is problematic for many reasons but one that specifically is worthy of consideration is that the Central Business District of our metropolitan area remains Downtown Victoria and while it may include parts of Saanich and Oak Bay and possibly Esquimalt, Langford is NOT part of the CBD. Density planning should be done on a regional basis and not at the municipal level- can you imagine if all 13 municipalities in the CRD produced similar plans to densify their cores, potentially creating 13 'poles', and creating a fragmented environment for industry, commerce and businesses? I can't believe this is the vision for Greater Victoria and if it is then there needs to be some transparency in this regard. But since our biggest employers in Victoria are the provincial government and tourism, both of which are located downtown, and given the pressure that the provincial government has put on employees to remain working downtown instead of remotely, I believe that our CBD for the Greater Victoria area is likely to remain downtown. Our municipal planning HAS to reflect this reality.

Langford, while it has grown enormously, remains a suburb of Greater Victoria and a lot of people choose to live here because it is a suburb and they do not wish to live in a fully urban environment. If the plan is to turn the CRD into a multi-pole urban area then this should be reflected in the plan or at least be part of the conversation around it. I strongly suspect, however, that this plan has been devised with Langford in mind out of the context of its place within the CRD. If we thought regionally, we should be putting pressure on Victoria to redevelop former industrial corridors that have fallen into decline as these are ideal sites to address density concerns in our metropolitan areas. It is not up to Langford to save the day and provide municipal solutions for what is a regional problem.

Towers in Langford are a short term fix to a regional problem and one that satisfies developers and investors who disappear once they have been built and then the city is stuck with them. Even having these huge height allowances opens the possibility of them coming to fruition regardless of intention and I still maintain that they will ruin our downtown core.

I really do hope you take what I have said here seriously and it gives you all pause on what seems like a runaway train at the moment. I don't know who was responsible for the ideas in this OCP draft but the vision for Langford's core seems very much at odds with the people I campaigned so hard for 3 years ago. Please put your constituents' concerns ahead of those of the developers."

Sent April 2, 2025:

"I'd love to chat more about this. I went and looked at the CRD RGS and the 2023 and 2024 progress checks but I still do not see the justification for the proposed density and towers in Langford within it. Rather I see even more reason to hold Victoria, Saanich, Oak Bay and Esquimalt to account. If anything, reading these reports makes me even more alarmed about the proposals in the draft OCP! The targets outlined in the RGS just don't make sense to densify Langford further given its distance to Victoria. Frankly unless there is a massive undertaking to pull government jobs out to the Westshore (looking unlikely given the post Covid environment downtown) then



encouraging people to live 10km away from where the majority of jobs are and then taking transit seems a truly bizarre way to meet the goals in the plan.

I think our OCP needs to reflect the reality of why people move to Langford and how this has fuelled its growth, and it is not our transport links and convenience but rather that it is more affordable and a significant factor in this is its distance to Victoria and the compromise in convenience that comes with that in terms of commute. The Greater Victoria geography and the narrow corridor that Highway 1 runs through between the hospital and McKenzie will always make this difficult to change. Densifying suburbs whose transit is constrained by this is always going to be challenging and without a realistic alternative to using the road network in the near future, to force this density now instead of in Victoria and neighbourhoods east of the Portage Inlet seems bordering on foolish- especially since we are already seeing that apartments are sitting vacant and unsold in our city centre.

I do appreciate the time you have taken to help me understand some of the decisions being taken in terms of development but and for the time you have afforded me in this back and forth. I do, in turn, hope that you understand that I would not be putting this effort into this exchange if I did not believe so strongly that what I see in the OCP with regards to building height in the downtown is hugely problematic for our city and it will be the city's residents who will be stuck with it if it's wrong and long after the developers, realtors and mortgage advisors and even potentially the provincial government have walked away. “

Thank you for your consideration.

Lucy Faulkner

Sent from my iPhone

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Cc:** [Mayor Goodmanson](#); [Lillian Szpak](#); [Mark Morley](#); [Kimberley Guiry](#); [Keith Yacucha](#); [Mary Wagner](#); [Colby Harder](#)  
**Subject:** OCP comments and concerns  
**Date:** May 20, 2025 2:38:56 PM

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Hello Langford Planning and Langford Mayor and Council,

Please find below my comments and concerns regarding the current draft Official Community Plan:

- Generally, please make the OCP shorter with more plain and readable language. Terms and acronyms like "multi-modal infill", "multi-modal infrastructure", "street activating", and "TDM" are confusing and not easy to understand. This OCP is for all Langford residents, not just those with advanced vocabularies.
- I appreciate all the aspirational targets and goals for tree planting, natural area protection, agricultural land protection, improving arts and culture, and increasing housing affordability and I truly hope we are able to achieve these targets.
- I am NOT in favour of 22 storey towers in Langford "Urban Centres" or 30 storey towers downtown. Instead, mid-density buildings in the 6-10 storey range are more suitable. Families moving to Langford do not want to live in towers. Please don't create the opportunity for mega towers in our City, it really doesn't make sense and we can meet our housing needs with smaller builds.
- Before building more housing, let's pause to look at what's currently still on the market! There are many developments in my neighbourhood that have yet to sell out all of their units. Stop using the provincial mandate to build housing as justification for plowing forward with more new builds.
- Ensure the OCP clearly defines green spaces as an area that is protected and provides some ecological value. The previous OCP considered parking lots and parks with little ecological value as green spaces.
- Appendix A includes an overview of Development Permit Areas - this is a good start. I would recommend expanding this section to include an overview of the City's development permit process, from start to finish. This could take the form of a simple diagram. The DP process remains a mystery to me, and most others I've spoken with. Shedding some light on how DPs are reviewed and approved would help with transparency and openness.

To Langford Mayor and Council: I urge you to **not** approve the OCP as currently written. We do not need 30-storey towers in Langford. Please follow through on your campaign promises to represent the community and to reconsider the pace of development in Langford.

Thank you for your consideration.

Sincerely,

Matt Rodgers

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Cc:** [Mayor Goodmanson](#); [Colby Harder](#); [Mark Morley](#); [Mary Wagner](#); [Keith Yacucha](#); [Kimberley Guiry](#); [Lillian Szpak](#)  
**Subject:** OCP Refresh and Towers  
**Date:** May 19, 2025 9:07:21 PM

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Dear Mayor and Council:

In the public feedback portion of the OCP's refresh, I supported densification on the OCP refresh, including some adjustments to maximum heights.

However, for a number of reasons that I've previously outlined, I do not support the allowed tower heights proposed in the draft.

I have brought this up with councillors via email letter and via social media exchange. As a result of their responses, I have felt patronized and my legitimate concerns either mischaracterized or dismissed.

I voted for change in this city because I didn't like how it was being developed. Despite assurances that the refreshed OCP will result in "quality builds" (a term I would like to see operationally defined beyond what I see in the document), I currently do not see how this plan tangibly improves things for the current or future residents of Langford.

A community plan should be about and for the people who live there. Otherwise it's just a plan.

Best wishes,

Rebecca McClure  
Langford Resident

**From:** [REDACTED]  
**To:** [Mayor Goodmanson](#); [Mary Wagner](#); [Kimberley Guiry](#); [Colby Harder](#); [Mark Morley](#); [Lillian Szpak](#)  
**Cc:** [Langford Planning General Mailbox](#)  
**Subject:** OCP feedback  
**Date:** May 18, 2025 4:08:33 PM  
**Attachments:** [png0402nhousing-06\\_294774362.jpg](#)

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Dear mayor and council,

I write to provide feedback on Langford's "refreshed" Official Community Plan to go before council on Tuesday.

The overall ideals and goals of the OCP are laudable, and I support many aspects of it. However, since this is just a "refresh" and many of the goals and aspiration have been retained from the previous version, I would like to know what kind of evaluation of outcomes was done on the previous OCP, and how we expect to meet the ones in the refreshed OCP. Words on a paper mean very little if there is not the action behind them to achieve the stated outcomes. From my observations as a long-time Langford resident, the previous OCP and its goals bore no resemblance to the realities of the outcomes on the ground and our lived reality in the community.

I do not support "planning for 100,000" - if you include that as the goal of your plan, everything will be oriented around that, and it is contrary to other goals in the plan for sustainable development. In the report it is stated that:

"Langford was the third fastest growing city in Canada between 2016 and 2021 – and shows no signs of slowing. Past projections have suggested that Langford could reach 100,000 residents within 15-20 years, but we can't know with real certainty when we will hit this number. What we do know is that growth is expected to continue." (p. 4)

The OCP has the most direct influence on how fast that population growth occurs and what that growth looks like. In section 8.16, the draft OCP states that the goal is 5,000 new homes by 2030 and 17,000 by 2045, which further research indicates comes from Langford's Housing Needs Reports. With an average of 2.5 people per household (Canada Census 2021), that gets us past 100,000 residents in 20 years. This is a self-fulfilling prophecy, if we are basing the increased housing need on the dramatically accelerated housing increases in the past 10 years, which was not what the trend was previously. Langford has been growing at an unsustainable rate, and we should be aiming to slow the rate of growth to give the community time to catch up with the needed supports for that growth, including infrastructure, services and amenities to serve such a large population. You did not hear in your engagement that it is the community's vision to grow past 100,000 in 20 years — you did not even ask the question. I will also say that it is very disingenuous to suggest that there isn't a timeframe on reaching 100,000 population, which many of you have done and which the OCP states, when the goal in the draft OCP is very explicitly to add the number of new housing units that will get us to that population in that timeframe. I also note that unlike many other municipalities, the provincial government has not ordered Langford to increase its housing by a set amount, so there is nothing driving it other than the historic rate of growth, which you all campaigned on being unsustainable. You need to reduce this number. 5,000 homes in the next five years is an insane rate of increase to have as the target in the OCP. I would assert — quite pointedly — that for all intents and purposes this makes you basically no different from the past council, which was ousted because people did not agree with the dramatically increased pace of growth. You were elected on a mandate of sustainable growth, and 5,000 homes in the next five years is not sustainable growth.

I note that while the OCP brings up the issue of housing affordability, there are few if any actions that will make a material difference on the matter of affordability. It has been demonstrated that added supply does not bring about affordability. If that were true, the fact that Langford has added so much supply in the past 10 years would have made a big difference on relative affordability in the region, which it has not - we continue to have market rates slightly lower than the core areas as we have for decades, not because of supply but because of distance, which is true of all suburbs. I encourage you to read this article, which provides further information on this topic.

png0402nhousing-06\_294774362.jpg



Opinion: When local planning becomes provincial command

vancouver.sun.com

The draft OCP also really silos the issue of affordable housing - affordability should be a concept woven through each section, otherwise it will not be top of mind in all of the important decision-making that will take place in the domains of urban infill, land use and city building.

I have deep concern over the residential building heights proposed for the zoning in city centre and urban centre areas. They are unnecessarily excessive. We compromise our bargaining power in negotiating with developers for bonus density if we are starting with such high density already. And those kind of heights are not necessary even to achieve the rate of growth you have premised the plan on — many places in Europe for instance, have far greater density with building heights generally limited to four to six storeys. The 24-storey height suggested for the area to the west of Langford Lake is an abomination; that cannot proceed as currently proposed.

For housing overall, this plan is mostly in service of developers. We need to find more effective ways of getting more affordable housing options out of this endeavour, and public amenities and infrastructure.

I think the sections on ecosystem protections (part 10), food security (part 13) and climate change (part 9) are particularly good and I wholly support those endeavours. As long as they actually happen in reality (e.g. actual real protection of ESAs). And the OCP should pay more attention to weaving those into other aspects of the plan, rather than having them siloed into separate sections. We need to consider all of these things holistically, as all aspects of planning are interconnected. In addition, how will we actually achieve these targets, so they are not just pages in a plan, but translate to the material reality on the ground in our community? I note there were similar aspirations in the previous version of the OCP, but they were not at all being achieved in anything but a tokenistic way (cue the carbon capture concrete program, as a prime example, while swaths of forested lands that provided ecosystems and climate resiliency were clearcut).

Overall I note many places where the wording leaves loopholes that can be ignored - "wherever practical and strategic" or "may" is not enforceable language. You have to think about making sure that future

councils have to follow this vision as well, and such loose wording does not create accountability for actually meeting those goals and outcomes.

I also would like to provide the following comments specific to noted sections of the OCP:

Regarding Map 2 (p. 29) - the area to the west of Langford Lake should NOT be designated as an Urban Centre area. I strongly oppose going from six storeys to 24 storeys in that area, which should be a buffer zone for a sensitive ecosystem area that has already faced enormous development pressures from the Westhills development up the hill from it, that has significantly degraded the water quality and caused enormous use pressures with crowding now all year. That lake is our community's crown jewel and needs to be better protected. 24 storey highrises along that side of the lake will absolutely ruin it, aesthetically, ecologically and from a use and enjoyment perspective.

5.31.3 - transit passes for people living in large buildings and large employers. This is great. I will note though that most discounted transit passes of this nature (through BC Transit) are only a cost-saving if a person commutes five days per week. In our new hybrid work environment where many people are only going in to work in the office three days per week, the economics of the transit passes as it stands now don't work. If you want to get people out of their cars, you will need to negotiate for deeper discounts on transit passes from BC Transit.

In Section 6 on Land Use Designations, per my above comment, you need to weave in something about affordability/affordable housing into the sections on City Centre and Urban Centres, as well as the Complete Communities. It's a big miss that there is no mention of that in any of the sections about those. Statements of commitment to affordable housing principles need to be woven in and integrated into this section so that affordability is not siloed into its own section. These are all interconnected, and you've reflected that in some other domains by integrating and cross-referencing, but you have neglected to do so for affordability.

Also from Section 6, six storeys in Neighbourhood Villages is too high. They should be four storeys maximum. There is nothing neighbourhood-like or village-like with a six storey building. The drawing on page 42 illustrates exactly my point. The difference between four and six storeys is substantial, for how it feels on the street. I live in a location (Goldstream Ave.) where two four-storey buildings went up a few years ago very close to me, and more recently, three six-storey buildings - the latter are hulking, block out the light and obscure any visible treelines. Four storeys fits reasonable density into an existing residential neighbourhood without feeling like an enormous change, particularly if proper setbacks are safeguarded.

In this same section, rezoning for a land assembly going to the highest height zoning for the whole property is a mistake. You are then putting pressure on residents in areas not zoned for those heights, and you lose your bargaining power with the developers.

More specifically to the zoning specifications presented in Section 6, I will say this: 30 storeys in city centre downtown zone is too high - 16 storeys would be better. 12 storeys in city centre moderate is too high - 8 storeys would be better. Corridors at 6 storeys is okay. Urban centres at 24 storeys is too high!! These should be more like 8 storeys max. And as stated above, Langford Lake should NOT have an urban centre designation. Six storeys in neighbourhood villages is too high - 4 storeys should be the max.

In addition, related to Land Use and Growth Management, I am concerned that the proposed level of pre-zoned density erodes our negotiating power with developers to get additional benefits, amenities, contributions, parkland donations etc. You really need to think about that and adjust to more reasonable levels so as not to compromise our ability to seek accommodation for having to service higher population levels.

Also, there should be a requirement in this section for building setbacks and micro-greenspaces/landscaping for all buildings. And the city approvals process then needs to stop allowing variances on setbacks.

In section 6.6, regarding the requirement to retain 40% of lands in pre-committed growth areas for park/greenspace, I fully support that, but would point out that that is not currently happening. That loophole needs to be closed, by ensuring a solid definition of what is park or greenspace, and not allowing variances on the requirement. My hope is that 14.25 provides the definition, but I don't know if that explicitly and in a binding way connects to 6.6.1.iii — if not, please revise the proposed OCP so that there is an enforceable definition of what constitutes park and greenspace, such that areas like parking, ditches, medians, etc. do not count toward that 40%, and it is not possible to get variances to reduce the 40%. Right now that amount of greenspace is not being protected at all, and we have had wide swaths of forest clearcut to accommodate development that run counter to many of the other goals in the plan (contiguous network of greenbelt, climate resilience, ecosystem protections, etc.).

Moving out of section 6, and into section 7...

Again, no mention of affordability! Under "density well done," this should be central. This is a big miss. In desired outcome 2 in section 7, for instance, you could add in here to prioritize housing of need and decrease core housing need. I note the absence of any mention of below-market housing and subsidized housing in this section. Wouldn't density well done include affordable housing options?

7.1 - I am concerned about "podiums" of large buildings not allowing for good setbacks to allow greenspaces in the streetscape. That section makes it sound like amenities for building residents will come at the expense of street-level public space, micro-green areas, etc. if the buildings terrace up.

I strongly support 7.4 (better architectural variety) and 7.6 (vibrant people-places between and in front of buildings). Any buildings four stories or higher really need to have decent set backs to allow for green space, landscaping, trees etc. I don't see that as a **requirement** in here, and it needs to be one.

7.14 states the outcome to "Integrate green and natural elements into site design, *wherever practical and strategic* in highly urban and urbanizing contexts (my emphasis). If you say "wherever practical and strategic" - that language leaves a big loophole. That should be tightened up so it's not so loosey-goosey and discretionary, otherwise it won't happen.

7.23 proposes to amend zoning to exclude "well-designed and strategic common amenity areas from floor area ratios calculations" - this privileges high-end and therefore highly unaffordable housing, letting them have their own set of rules separate from what applies to everyone else. If that were changed to strategic **public** common amenity areas, it would solve the issue. Why would we set up a two-tier system that means the high-end developments have a different set of rules?

Moving on to section 8...

The goals in this section around affordable housing are great, but I encourage you to weave them throughout the document too. This is very siloed from the rest of the plan. It needs to be integrated. It's all interconnected.

I will reiterate my feedback at the start, in reference to 8.15 - 5000 new homes by 2030!!! 17,000 by 2045!!! This gets us past 100,000 in 20 years. That is much too much growth too fast. Why are we making this a target? It directly contradicts the assertion that there is no timeframe on the 100,000 population. I do not believe that you heard in your engagement that it is the community's vision to grow past 100,000 residents in 20 years or less. This surpasses the Province's housing target requirements. You need to reduce this



number. 5,000 homes in the next five years is absolutely insane. Just because we grew at a certain rate over the past 10 years does not mean we should keep growing at that rate. We don't have the capacity from a services/infrastructure/amenities/liveability perspective.

On section 9....

I like this section a lot. In particular, I am very supportive of 9.11-9.14, which outline desired outcomes to improve our resilience to the effects of climate change by incorporating green infrastructure systems.

Under Desired outcome #5 in section 9, specifically in reference to efficient energy systems, I would really love to see Langford include a goal of reducing nighttime light pollution into this section. Also, there is research starting to show that LED street lighting is not good for human populations (and I presume wildlife populations) from a health perspective. The city should make sure that as it looks at retrofitting street lighting (part of 9.29), you are following both health and environmental protective approaches.

On section 10...

I really like this section and am thrilled you have explicitly included ecosystem protection. Environmentally sensitive area (ESA) protections in development permit areas need to have teeth though. Right now they look good on paper but in reality on the ground provide wholly inadequate protections. Buffer zones, contiguous connections to other green corridors, and the like are important considerations in strengthening these protections on paper and on the ground, including enforcement.

I would like to see Environmentally Sensitive Areas expanded. For example, the north end of Langford Lake should absolutely be an ESA.

10.1 - 10.7 - Yes! These are great goals around ESAs. However, you need to make sure that the provisions that are meant to protect Environmentally Sensitive Areas actually do so. There are many examples where ESAs in development permit areas have not been protected. That needs to be strengthened, so that there are actual material protections. This includes sufficient buffer zones around ESAs to effectively protect them, in a more ecosystem-focused approach. On 10.7, I encourage Langford to not just align with provincial or regional targets, but to exceed them. Let's be a regional leader in this area.

I like what looks to be a new section under Outcome #3 on developing a culture of collaboration for ecological conservation (10.10-10.12). I unfortunately don't have a copy of the previous version, so I'm not sure, but it's a good addition if so.

Under outcome #4 to develop an interconnected network of green spaces and habitat corridors, I full support this (10.13-10.17). Under 10.17, "Ensure the connectivity of the City's ESAs is a priority in land use planning" — how will the city do that? I note that 6.6.1.iv would mandate housing in pre-committed growth areas to be clustered so as to preserve green space and ESAs, but that is the only mention of ESAs in the entire section on land planning. Again, this is an example of how the plan is siloed. There should be cross-referenced, mutually enforcing goals and desired outcomes across various sections - particularly so that these are explicitly included in the sections on planning, development and housing, which have the greatest impact on our ability to achieve stated outcomes in the area of ecosystem protection, climate resilience, affordable housing, etc.

10.18 - The target of a 40% urban forest canopy by 2050, is a **17% reduction** in the urban forest canopy! That is a significant loss of canopy, when we should be prioritizing increasing our urban forest canopy to help create a more resilient and healthy community in the face of climate change. This is at cross-purposes with other goals in the plan (ecosystem protection, climate resilience, green space, etc.).



On section 13...

I love this section on food security. I really support the stated goals — in particular, 13.3 (leveraging land from developments for community gardens), 13.4 (adding community gardens to the Parks and Trails Master Plan), 13.5 (incentivizing food growing opportunities in new multi-family developments).

I also very much support the whole sub-section under desired outcome #2 to protect and integrate productive agricultural lands (13.9-13.19). As the trade war with the U.S. has shown, preserving as much self-sufficiency in the area of food production as we can is essential. Likewise the target/commitment to permit community gardens in most zoning (13.23) is welcome.

On the target 13.26 to include allotment gardens as a density benefits strategy, I would also encourage that this not just exclusively be for off-site allotment gardens, but incentivize developers to include communal gardening space for tenants/owners on the property itself.

On section 14....

The desired outcome of a connected network of parks and people-places is welcome. (14.1 - 14.8). In particular, 14.7 to work with neighbouring municipalities on creating a West Shore greenbelt is a fantastic idea. And maximizing public access to waterbodies (14.8) with city ownership is also a great goal.

14.9 - I love the goal of creating meaningful and affordable public gathering spaces. That is a huge gap in Langford. Because we are a suburb, we don't have community halls and other spaces like that that smaller towns often have, that serve as multi-functional gathering spaces. As 14.31 suggests, this can be made a condition of approving more densification; for example, the Quality Foods at Eagle Creek on Helmken has two meeting spaces for the community to use for free that were a condition of development from View Royal. The city should do something similar, and I hope that's what is being proposed in target 14.31. There are almost no spaces to have community organizing meetings that aren't cost-prohibitive for community groups.

14.26 - this target for city-owned parkland is inadequate. If you are talking about 100,000 more residents, that is a 100% increase in population. Already the amount of city parkland is inadequate to provide sufficient access to good useable parkland. Increasing it by only half the planned rate of population growth will deepen our deficit in this area. Recognizing the city doesn't have a lot of financial resources, you should ensure that the city retains the ability to negotiate with developers to have them donate land for public green/park/natural space in exchange for development approvals. Of course, zoning for the level of density you have included in the plan leaves little leverage for that - another reason to revisit the building heights suggested.

Those are all of my section-specific comments. I also want to make one final comment before signing off (and thank you for your diligence in reading through my comments - which are comprehensive! :). I wanted to note that I see in several places that some of my feedback from the survey has been incorporated (perhaps it was similar to feedback others provided as well). I had kept a copy of my feedback on the survey in March/April to use as a starting point for providing comments directly to council before you begin formal deliberations on the refreshed OCP, and I was able to delete several of my areas of critique. It's nice to see that the staff did actually incorporate feedback from the public engagement on the first draft of the refreshed OCP.

I am disappointed feedback about the zoning height limits was not incorporated into revisions as well, as I am aware of similar feedback from a number of other residents. I expect you will be hearing further feedback from many voices on that point during public participation, and I urge you to listen carefully to

what the residents want. And if you hear only one thing from my feedback, please hear this: do not allow 24 storey buildings to go up near Langford Lake.

Thank you,  
Sarah Plank

[REDACTED]

Langford, B.C.

**From:** [REDACTED]  
**To:** [Langford Planning General Mailbox](#)  
**Subject:** Lippincott Road  
**Date:** June 19, 2025 6:46:22 PM

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Good afternoon , please reconsider your designation on “future planning” for Lippincott Road. With the creation of the westshore parkway and Finney Road extension, it is a perfect area to develop to support Langford’s goals. Developers have already made offers and are open to start developing Lippincott road and it is disappointing to see our road taken out of the current plan. Many of us have lived here for years and are open and are ready to develop. We should not go backwards or be unzoned when we have all provided input over the last 30 years to get South Langford to where it is today...which is still a work in progress. We typically have larger parcels in this area and our taxes are increasing every year and developing is a welcomed way to support Langford’s goals and the residences in our area.

Thank you for listening!

[REDACTED]