

From: [Nickel, Ken AGRI:EX](#)
To: [Poltorak, Brenna AGRI:EX](#); [Borba, Brenda L AGRI:EX](#)
Subject: FW: A thought
Date: Tuesday, August 9, 2016 4:12:55 PM

FOI – 1 of 3

From: Nickel, Ken AL:EX
Sent: Tuesday, December 11, 2007 9:23 PM
To: van Dalfsen, Bert AL:EX
Subject: RE: A thought

Thanks Bert

Discussed with Harvey and we agree the ALC needs to lead the response to this issue. We will engage at their request.

Ken

From: van Dalfsen, Bert AL:EX

Sent: Tuesday, December 11, 2007 8:46 AM

To: Nickel, Ken AL:EX

Subject: A thought

Ken,

I know that you're busy on the Strategic Plan. Would you have an opportunity to check with Harvey on the topic of subdivision. After the reference at the MAL meeting, it makes me wonder what the next steps ought to be.

Bert

Bert van Dalfsen, PEng

Manager, Strengthening Farming Program

Resource Management Branch

British Columbia Ministry of Agriculture and Lands

1767 Angus Campbell Road

Abbotsford, BC

Canada V3G 2M3

Phone 604 556-3109

Fax 604 556-3099

bert.vandalfsen@gov.bc.ca

Poltorak, Brenna AGRI:EX

From: Nickel, Ken AGRI:EX
Sent: Monday, August 15, 2016 4:17 PM
To: Poltorak, Brenna AGRI:EX; Borba, Brenda L AGRI:EX; Margerison, Elizabeth AGRI:EX
Cc: Schmidt, Orlando AGRI:EX
Subject: FW: Comox Valley Lot Size Report - Revised Draft

3 of 3

Sorry for the delay!

Ken

From: van Dalfsen, Bert AL:EX
Sent: Friday, February 1, 2008 2:33 PM
To: Nickel, Ken AL:EX
Cc: Thomas, Karen AL:EX; MacDonald, Leslie S AL:EX
Subject: FW: Comox Valley Lot Size Report - Revised Draft

Ken,

Karen and I met today with Brian Underhill to discuss this report.

s.13

Bert

From: Aikman, Jennie S AL:EX
Sent: Thursday, October 11, 2007 4:41 PM
To: Cheetham, Roger ALC:EX
Cc: van Dalfsen, Bert AL:EX; Thomas, Karen AL:EX; Underhill, Brian ALC:EX; Hatfield, Jill AL:EX; Karlsen, Erik AL:EX
Subject: RE: Comox Valley Lot Size Report - Revised Draft

Thanks Roger.

Attached is the most recent draft of the report - this is the version we should refer to in our meeting on Oct.24th. There are only a few minor changes from the version I sent earlier today. For example, Part F was changed to reflect the fact that the Summerland Ag plan is only draft at this stage.

Jennie



From: Cheetham, Roger ALC:EX
Sent: October 11, 2007 4:37 PM
To: Aikman, Jennie S AL:EX

Cc: van Dalfsen, Bert AL:EX; Thomas, Karen AL:EX; Underhill, Brian ALC:EX; Hatfield, Jill AL:EX; Karlsen, Erik AL:EX
Subject: RE: Comox Valley Lot Size Report - Revised Draft

Thanks Jennie, 1:30 p.m. on 24th October 2007 in Commission office confirmed.

From: Aikman, Jennie S AL:EX
Sent: Thursday, October 11, 2007 4:35 PM
To: Cheetham, Roger ALC:EX
Cc: van Dalfsen, Bert AL:EX; Thomas, Karen AL:EX; Underhill, Brian ALC:EX; Hatfield, Jill AL:EX
Subject: RE: Comox Valley Lot Size Report - Revised Draft

Hi Roger -

Karen and I have discussed this with Bert and he would also like to attend.
October 24th at 1:30 PM works best for us.

Jennie

From: Cheetham, Roger ALC:EX
Sent: October 11, 2007 3:55 PM
To: Aikman, Jennie S AL:EX
Cc: Thomas, Karen AL:EX; Underhill, Brian ALC:EX; Hatfield, Jill AL:EX
Subject: RE: Comox Valley Lot Size Report - Revised Draft

Hi Jennie I have had a response from Erik and he can make himself available on either 24th or 25th October in the Commission offices at 1:30 p.m. Would that work for you and Karen? We might be able to link with Jill by phone if necessary.

Cheers

Roger

From: Aikman, Jennie S AL:EX
Sent: Thursday, October 11, 2007 2:33 PM
To: Hatfield, Jill AL:EX; Cheetham, Roger ALC:EX; Thomas, Karen AL:EX; LeMaistre, Jim F AL:EX
Cc: van Dalfsen, Bert AL:EX
Subject: Comox Valley Lot Size Report - Revised Draft

Hi Folks -

I have incorporated your comments and suggested changes into the attached version of the Comox Valley Lot Size report.

Here are some of the major changes:

- 1) Added a paragraph to the Study Area/Scope section that summarises relevant information from the 2002 Comox LUI report.
- 2) Revised Section 1 of Part C that deals with changes in parcel size from 1997 to 2007. I have re-analysed the data and adjusted the numbers to account for several large exclusions (upland forest areas) that occurred between these years. I also narrowed the scope to include only ALR parcels from Courtenay Rural jurisdiction and did not include Campbell River as was done in the earlier analysis. I spoke with BC Assessment and they felt that the methodology used was sound.
- 3) Revised Section 2, Part C. Amalgamated the numbers for "approved - implemented" and "approved - not implemented" into one "approved" category. Added a "percent change in agricultural use" to the graph.
- 4) Revised Part E on average sale price per hectare. I used a larger sample and removed all parcels <2 hectares as these skewed the results (and would likely not be purchased for agricultural purposes to begin with).

Other minor changes:

- All references to RDCS changed to CSR
- All references to CORD changed to RDCO
- Updated charts to make them suitable for printing in black and white
- Simplified maps and changed colours (these don't show up as well in black and white, but it's the best I could do).

Jill and Roger, s.22

would like to have a final draft of the report completed s.22 If you have any concerns or comments about the latest changes to the report, please let me know by Friday, October 19th.

Jennie

Jennie Aikman
Land Information Coordinator
Resource Management Branch
Ministry of Agriculture and Lands
1767 Angus Campbell Road
Abbotsford, BC
V3G 2M3
(604) 556-3110
jennie.aikman@gov.bc.ca

<< File: Land Use Lot Size Report_September condensed_v2.doc >>

From: [Nickel, Ken AGRI:EX](#)
To: [Poltorak, Brenna AGRI:EX](#); [Borba, Brenda L AGRI:EX](#)
Subject: FW: Subdivision Report
Date: Tuesday, August 9, 2016 4:18:44 PM
Attachments: [Comox_LandUseLotSize_Internal_Report.doc](#)

2 of 3

Ken

From: van Dalfsen, Bert AL:EX
Sent: Tuesday, November 20, 2007 9:58 AM
To: Sasaki, Harvey AL:EX
Cc: Nickel, Ken AL:EX
Subject: Subdivision Report

Hello Harvey,

Ken mentioned that you wanted to see the draft report. I understand that the ALC plan to propose some significant changes to this document (some time in the new year).

Bert

Bert van Dalfsen, PEng

Manager, Strengthening Farming Program

Resource Management Branch

British Columbia Ministry of Agriculture and Lands

1767 Angus Campbell Road

Abbotsford, BC

Canada V3G 2M3

Phone 604 556-3109 Fax 604 556-3099 bert.vandalfsen@gov.bc.ca

Land Use Activity and Parcel Size in the ALR: A Pilot Study in Comox–Strathcona Regional District Key Findings and Recommendations

This document summarises the key findings and recommendations from a pilot study undertaken by the Ministry of Agriculture and Lands (MAL) and the Agricultural Land Commission (ALC) in the Comox Strathcona Regional District (CSRD) Agricultural Land Reserve (ALR) to understand: the effects of subdivision on land use; the relationship between parcel size, property value and agricultural activity; and the inter-agency decision-making process in supporting or denying subdivision in the ALR.

Key Findings

- ★ In the Comox Valley there are a high number of small lots in the Agricultural Land Reserve. In 2007, 61% of all ALR parcels were less than 8 hectares.
- ★ On subdivided parcels, the total number of hectares in agricultural use went from 82 hectares in 2002 to 73.4 hectares in 2007, resulting in a 10.5% decrease in the amount of land in production.
- ★ Agriculture is more enduring on parcels where subdivision has been refused; these parcels are more likely to retain their original agricultural uses and gain new ones than those parcels approved for subdivision.
- ★ Agricultural land uses appear to be more readily retained on larger parcels.
- ★ The average per hectare sales value of properties less than 4 hectares is almost 8 times that of properties larger than 16 hectares.
- ★ One quarter of all the proposed new lots were approved.
- ★ The majority of applications were refused. Of all approved applications, 56% were approved with conditions.
- ★ The minimum lot size set out in the zoning bylaw did not appear to have a significant influence on the decision-making process.
- ★ With respect to decisions on subdivision, the highest level of agreement (81%) occurred between the Agricultural Land Commission and the Comox–Strathcona Regional District, and the lowest level of agreement (63%) occurred between the ALC and the CSRD Agricultural Advisory Committee (AAC).

Recommendations

- ✓ Local government plans can contain valuable policy direction relating to stewardship of agricultural land. This information should be consistently referred to by all agencies when making decisions on subdivision.
- ✓ Future changes to the Official Community Plan (OCP) and zoning bylaw should consider establishing only one zone for the entire ALR as recommended by the Comox Valley Agricultural Plan. Also, the ALC and Regional District should work together to ensure that mapping of the ALR boundary is consistent with local cadastral mapping.
- ✓ Conditions applied at the time of subdivision approval should be used to encourage the development of agriculture on subdivided lots:
 - Post bond at the time of approval until a farm is developed.
 - Require proof of intent (i.e. farm plan) to develop the lot for farm purposes.
 - Restrict the development of an additional house until a farm is established.
 - Place a covenant on the new lot requiring it to be used for farming purposes.
- ✓ The Ministry of Agriculture and Lands' agricultural land use inventory data to investigate changes in land use on parcels with subdivision applications. This methodology could be readily applied in other areas where land use inventories are available for consecutive years; this approach would be invaluable in helping to improve the understanding of the impacts of subdivision on agricultural activity levels.
- ✓ Further investigation should be undertaken to understand how decision criteria differ by agency.
- ✓ In areas where non-soil based agriculture (e.g. poultry, greenhouse, and mushroom production) is prevalent, agricultural suitability should not be a factor in considering cases of subdivision.
- ✓ Given existing policies that support the protection of agricultural lands and the retention of large parcels, agencies should make clear recommendation of either support or refusal. It may be more appropriate to demonstrate that proposals will protect or enhance agriculture rather than simply have no negative impact.

- ✓ Improve the tracking of subdivision applications:
 - Applications for subdivision and non-farm use applications have the same application code making it difficult to track subdivision. To address this, each type of application should be recorded using a distinct code.
 - A consistent record of proposals and decisions in the database would aid in more effective and efficient future studies.
 - By consistently recording (in the ALC file) the Jurisdiction Roll Number assigned to properties by BC Assessment, the parent parcels and new parcels created through subdivision would be easier to identify for study purposes.
 - A consistent record of subdivision implementation, parent parcel identifiers, and new parcel identifiers would greatly enhance the ability to study subdivision and land use.
 - Future studies should investigate parcel size and agricultural land use within a complete jurisdiction (e.g. regional district, municipality, electoral area) to simplify analysis and provide a complete picture of land use and lot size in the region.
- ✓ Develop a coordinated system to record land use. A coordinated system of recording specific land uses and cover types at the time of application could be of benefit in terms of future study and decision making processes.
- ✓ Develop decision-making criteria for subdivision applications. If all agencies developed and used a consistent list of criteria, this could facilitate more consistent decision making by all parties and ensure increased transparency in the decision-making process.
- ✓ Investigate consistency of local government policies and decisions. Further study is needed to understand to what degree local governments are reviewing subdivision applications, the criteria they are using in the decision-making process, and how successful they are at achieving the goals and objectives outlined in their plans with respect to subdivision in the ALR.
- ✓ Encourage agriculture on existing small lots.
 - Reduce speculation for urban uses.
 - Reduce the residential footprint.
 - Encourage parcel amalgamation and leasing.
 - Develop support programs.
 - Change zoning bylaws to support more diverse agricultural activity.

DRAFT FOR DISCUSSION

October 11, 2007

Land Use Activity & Parcel Size in the ALR: A Pilot Study in Comox-Strathcona Regional District



BC Ministry of Agriculture and Lands
& BC Agricultural Land Commission
September 2007

DRAFT

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Findings and recommendations are highlighted throughout this report.
Look for the following:



Key Finding



Recommendation

Part A: Background

1. Introduction

The size of a parcel influences the type of farm operation (e.g. poultry, dairy, berry) that can be established on it. Typically, the more extensive the farm operation, the larger the parcel needed. Smaller parcels are usually better suited to more intensive types of farming as less space is required to conduct the activity.

Currently, the BC Ministry of Agriculture and Lands (MAL) does not have a province-wide standard established for minimum lot size in the Agricultural Land Reserve (ALR) due to the variability of farming needs throughout the province. At present, there are two mechanisms that control minimum lot size and subdivision; local governments set minimum lot sizes within their zoning bylaws and if a property owner wants to subdivide their parcel (and meets the minimum lot size requirement), final approval for subdivision must come from the Agricultural Land Commission (ALC).

Subdivision of farmland into smaller parcels has its pros and cons. It can be argued that the maintenance of larger parcels sizes in regions with a limited supply of small parcels precludes more intensive production systems from occurring and limits opportunities for first time farmers to acquire farmland. However, it can also be argued that encouraging the subdivision of farm parcels does not support a wide range of agricultural activities and may be detrimental to the long term well being of a community's agriculture industry.

A pilot study was undertaken by the Ministry of Agriculture and Lands and the ALC in the Comox Strathcona Regional District (CSRD) ALR to understand: the effects of subdivision on land use¹; the relationship between parcel size, property value and agricultural activity; and the inter-agency decision-making process in supporting or denying subdivision in the ALR.

2. Study Area and Scope

The primary focus of this study is on ALR parcels that received application for subdivision between January 1st, 1990 and December 31st, 2006. This time frame reflects the period when records were digitally entered into the ALC's Application Tracking System (ATS) database. Future studies may wish to examine hardcopy files back to an earlier date, as subdivision was occurring in Comox Valley prior to 1990.

For the purpose of this study, the study area is referred to as the Comox Valley and includes all ALR parcels located in the Comox-Strathcona Regional District within the Electoral Areas A, B, C, and a portion of Electoral Area D containing the former U.B.C. research farm at Oyster River.

This area was chosen for this study because:

- subdivision activity was known to be occurring in the Comox Valley;
- the sample size was manageable;
- land use and parcel size data was readily available; and,
- Comox Strathcona Regional District has a well established farming area.

¹ There are many variables that can affect land use and agricultural activity levels; the scope of the pilot study is intended to identify general relationships that may exist with regard to lot size and land use/agricultural activity. In order to fully determine the reasons for different agricultural activity levels on farm parcels, more extensive research, including an in-depth survey of property owners, would be required. This is beyond the scope of this study.

The Comox Valley is home to 445 farms (Census of Agriculture, 2001). The size of the average farm is 30.8 hectares, and the total amount of land farmed in the region is 13,700 hectares. Farming in the CSRD typically occurs on larger parcels than on Vancouver Island as a whole. The 2001 Census of Agriculture reports that 131 farms are less than 4 hectares and 207 farms are in the 4 to 28 hectare range. The remaining farms are found on parcels larger than 28 hectares.

The 2002 Comox-Strathcona Land Use Inventory draft report (MAL, 2005) indicates that 42% of the ALR parcels in Comox-Strathcona were being farmed at the time of the survey. Of all the parcels in CSRD the ALR 10% were alienated from farming due to residential use and or other land uses that would preclude future farming. Of the properties available for farming, 48% were not farmed and were being used for other purposes including residential and hobby farm use. The majority of farmed parcels (61%) were larger than 8 hectares. Forage production was the predominant agricultural use on these parcels.

Farmers in the Comox Valley produce a variety of crops and livestock. Cattle ranching and other livestock operations are the most common farm types in this region, followed by greenhouse, nursery, and floriculture production. Other types of farms include poultry and egg production, fruit and nut orchards, vegetable, and grain farms. In terms of area, field crops and unmanaged pasture comprise most of the farmed land in this region (Census of Agriculture, 2001).

3. Regulatory Context: Policy and Zoning affecting Minimum Lot Size

Local government policies within Official Community Plans, Agricultural Area Plans, and regulations within zoning bylaws provide direction for establishing minimum lot sizes and controlling subdivision in the ALR. The Comox-Strathcona Regional District has relevant policies and regulations within their Rural Comox Valley Official Community Plan (OCP), Comox Valley Agricultural Plan, and Comox Valley Zoning Bylaw.

Rural Comox Valley Official Community Plan (1998)

The objectives and policies in the OCP contain policy directions relating to stewardship of the agricultural resource base to promote its long-term viability. Of particular note is Section B13:

B.13 (d): The retention, protection and enhancement of lands with agricultural capability shall be supported.

B.13 (e): Consolidation of smaller parcels of agricultural land into larger, more viable agricultural units is encouraged and any reduction in land area of a viable farm operation shall be discouraged.



Local government plans can contain valuable policy direction relating to stewardship of agricultural land. This information should be consistently referred to by all agencies when making decisions on subdivision.

Comox Valley Agricultural Plan (2002)

The Comox Valley Agricultural Plan encourages future OCP revisions to develop consistency between the OCP and Agricultural Plan policies. Related policies include:

- Support no net loss of land from the ALR

- Restrict subdivision and housing development on agricultural lands
- Retain current large agricultural parcels

These recommended policies are targeted at retaining the ALR land base in the Comox Valley. As a revised OCP has not been prepared to date, it may not reflect all recommendations outlined in the Agricultural Plan.

DRAFT

Comox Valley Zoning Bylaw (2005)

The Comox Valley Zoning Bylaw sets a number of minimum lot sizes for parcels within the ALR depending on the zoning designation. The majority of parcels have a minimum lot size of 8 hectares².

Table 1 summarises all the zoning designations present on parcels completely within the Comox Valley ALR. See Appendix A for a full list of the zoning that applies to land both partially and completely within the Comox Valley ALR.

Under the current zoning 18% of parcels in the Comox Valley ALR have potential for subdivision (Figure 1). This was determined by applying the minimum lot size within each zone to the 2007 Comox ALR cadastral mapping.

**Figure 1: Parcels with Potential for Subdivision
Comox Valley ALR**

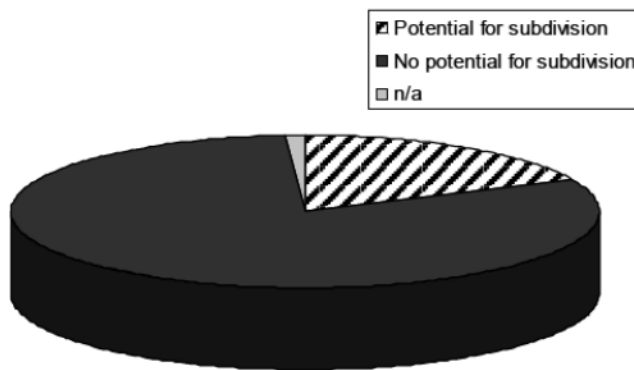


Table 1: Zoning of Parcels Completely within the Comox ALR

Zoning Designation	Min. Lot Size (Ha)	Number Parcels	Average Area (ha)
RU-ALR	8	1275	10.79
UR-40ha	40	35	19.93
RU-1	8	19	17.61
PA-1	0.0325	9	1.37
IL	1	5	0.98
RU-8	8	3	2.74
UR-400ha	400	1	43.73
RR-1	20	1	37.58
CA	0.4047	1	0.83



Future changes to the OCP and zoning bylaw should consider establishing only one zone for the entire ALR as recommended by the Comox Valley Agricultural Plan. Also, the ALC and Regional District should work together to ensure that mapping of the ALR boundary is consistent with local cadastral mapping.

4. Decision Process

Final approval for subdivision of ALR land comes from the ALC. Subdivision applications are first submitted by the applicant to the local government. The proposals are then reviewed and can be commented on by several agencies. In the Comox-Strathcona Regional District, these agencies include Community Planning Services, CSRD Agricultural Advisory Committee, the BC MAL Regional Agrologist, and the Regional District Board. The Board can choose to refuse the application; if it supports the application, the Board must forward it to the ALC along with any

² There are provisions set out under the ALC Act that enable these minimum lot sizes to be varied. This enables homesite severance and other Commission approvals for lots that are smaller than the zoned minimum lot size without the need for a formal rezoning process.

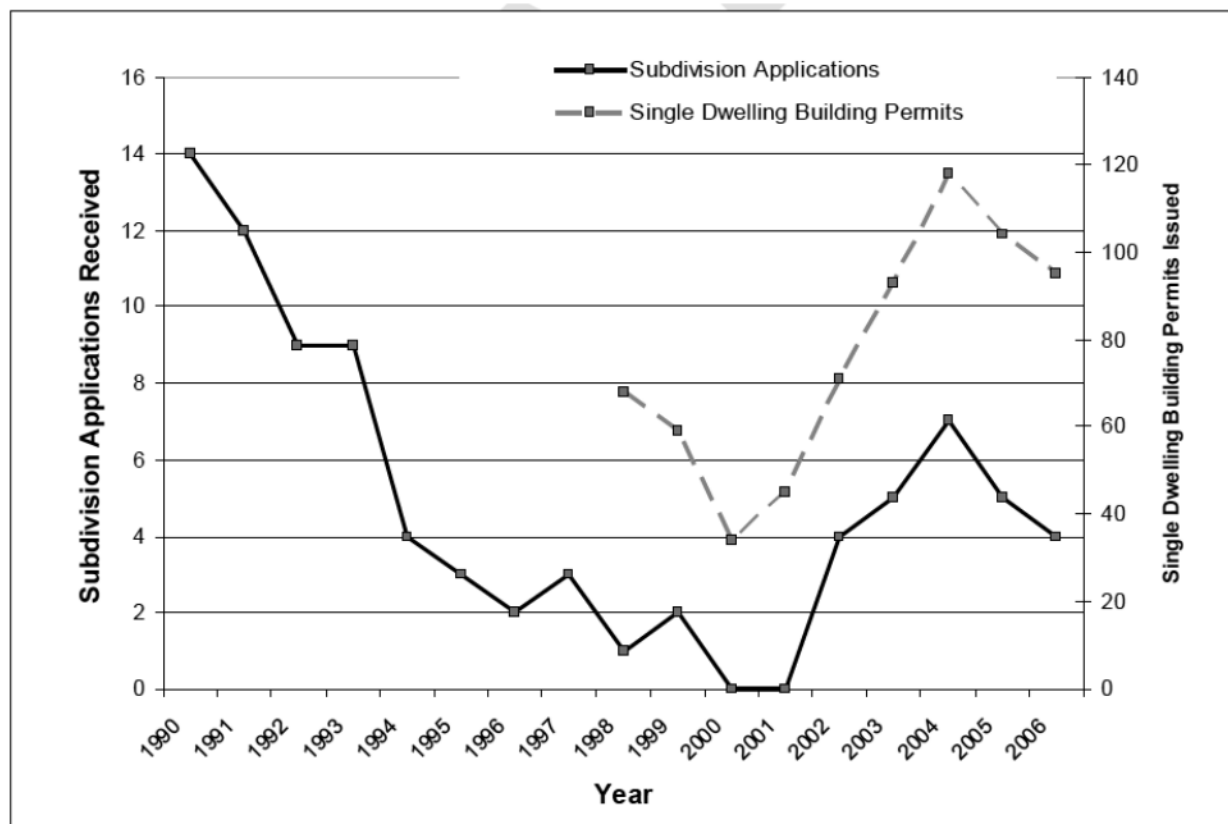
comments supplied by the different agencies. In cases where a proposal is refused by the Commission, applicants can either reapply or ask that their file be reconsidered provided they offer new information. With regard to this study, no properties were applied for more than twice between 1990 and 2006. In some circumstances the ALC may apply conditions to the approved decision resulting in four types of approvals: approved as proposed, approved with conditions, refused as submitted but approved alternate proposal (on reconsideration), refused as submitted but approved alternate proposal with conditions (on reconsideration).

Part B: Results - Subdivision Applications

1. Application Trends

85 applications for subdivision were made between January 1st, 1990 and December 31st, 2006.³ The annual number of applications received varied from 0 to 14 over this time period (Figure 2). In 2000 and 2001 no applications were received. The increase in applications after 2001 is consistent with overall market and economic activity in the Comox Valley during that period. This trend is consistent with numbers of single dwelling building permits issued for the rural areas of the Regional District over the 1998-2006 period (Figure 2).⁴ Market activity is at a low in 2000-2001, increasing to 2004, and declining again after that.

Figure 2: Annual Subdivision Applications Compared with Single Dwelling Building Permits



³ One file from 1994 was unavailable; this file has been omitted and the total number of applications reviewed is 84.

⁴ This includes both ALR and non-ALR areas of the CSRD.

2. Properties with Repeat Applications

Following an initial refusal, 10 properties were subject to re-application for subdivision. Four of these were refused a second time and the remaining six were approved.

3. Applications and New Lots Approved

Of the 84 applications made, 39 were approved. This resulted in the potential creation of 31 new lots within the ALR, as 5 approvals were for boundary adjustment and 3 approvals were on the condition of parcel consolidation. Not all approved subdivisions were implemented, so the net increase in parcels between 1990 and 2006 is less than 31. If all 84 applications had been approved as proposed, 121 new lots could have been created within the ALR.



One quarter of all the proposed new lots were approved.

4. Proposals and Approvals - Consistency with Zoning Bylaws

The proposals for subdivision reviewed for this study typically did not adhere to the prescribed minimum lot sizes. Of the applications, 75% proposed at least one new parcel that would be smaller than the specified minimum lot size. Of all applications received, 24% were made under the homesite severance policy and most proposed homesites were for parcels of one hectare or less, a size that is inconsistent with the CSRD's Rural ALR zoning.

Figure 3: Zoning Designations on Parcels with Subdivision Applications

Zoning	Minimum Lot Size
RU-ALR..... Rural ALR	8 ha
RU-1..... Rural One	8 ha
CR-4..... Country Residential Four	8 ha
UR-40..... Upland Resource	40 ha
RM..... Residential Multiple	0.4 ha (4000 m ²)
PA-1..... Public Assembly	0.0325 ha (325 m ²)

Of the 39 approved proposals, 79% were not consistent with Comox-Strathcona Regional District's zoning. Approvals under the homesite severance policy account for 38% of the total approved proposals. Of all approved applications, 41% do not conform to the minimum lot size and are not homesite severances.



The minimum lot size set out in the zoning bylaw did not appear to have a significant influence on the decision-making process.

5. Applications Approved and Refused

Figures 4 and 5 show the annual number and percent of subdivision applications approved and refused by the ALC. The distribution of applications by decision can be seen in Map 1.

Figure 4: Applications Received by Year and Decision

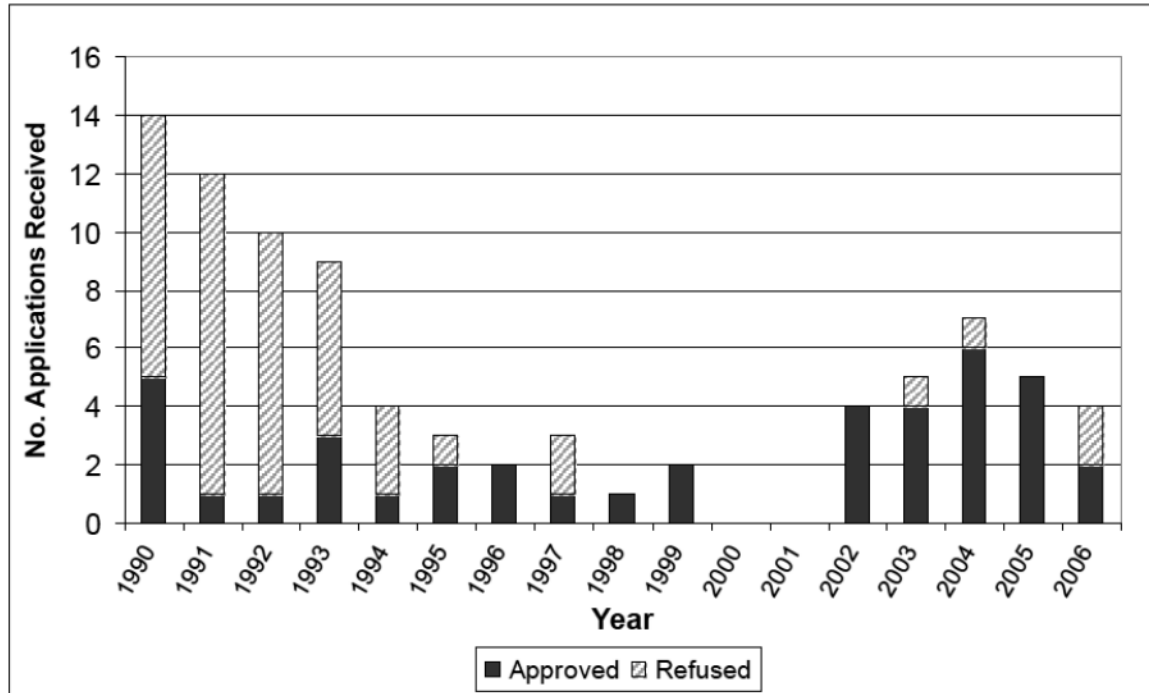
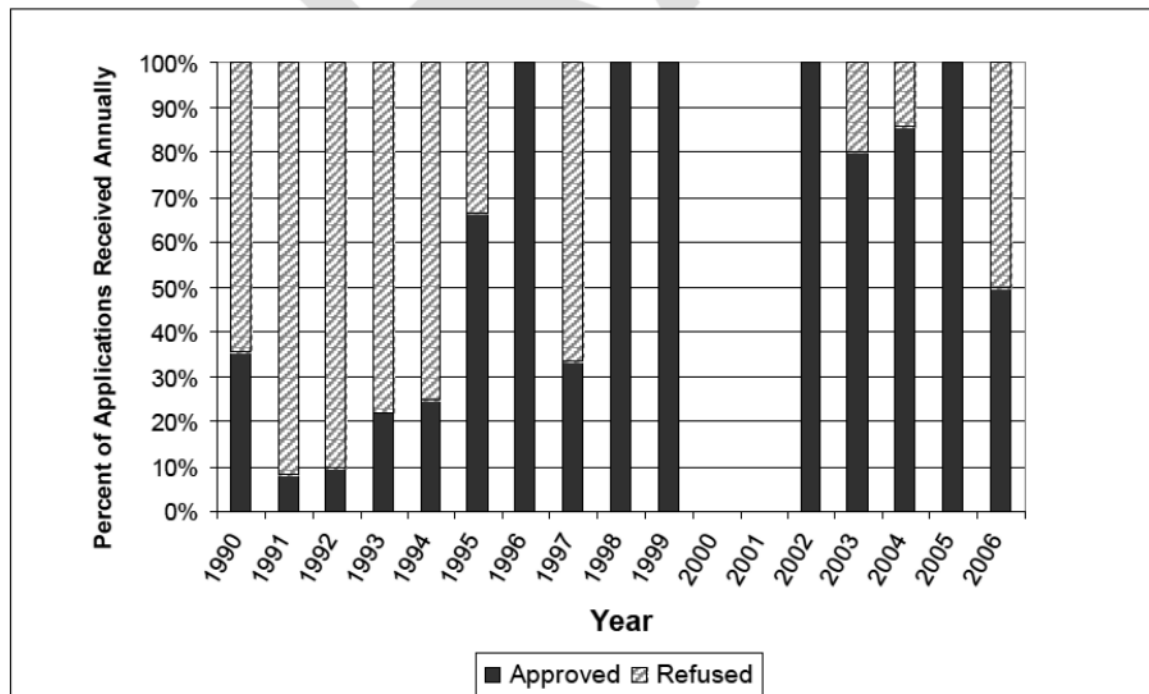
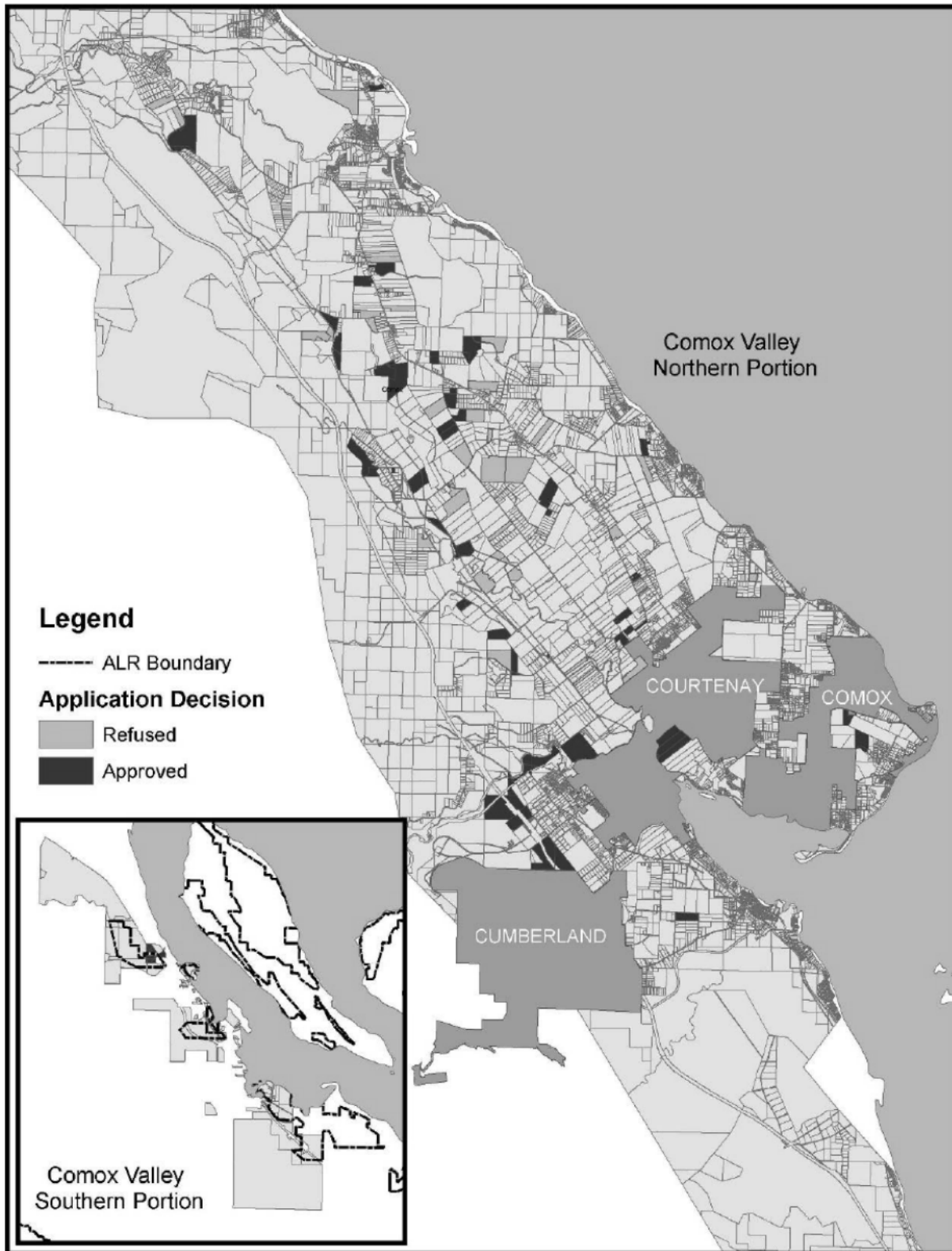


Figure 5: ALC Decision as a Percent of Total Annual Applications



Map 1: Location of properties with subdivision applications in the study area.



6. Types of Approval Decisions

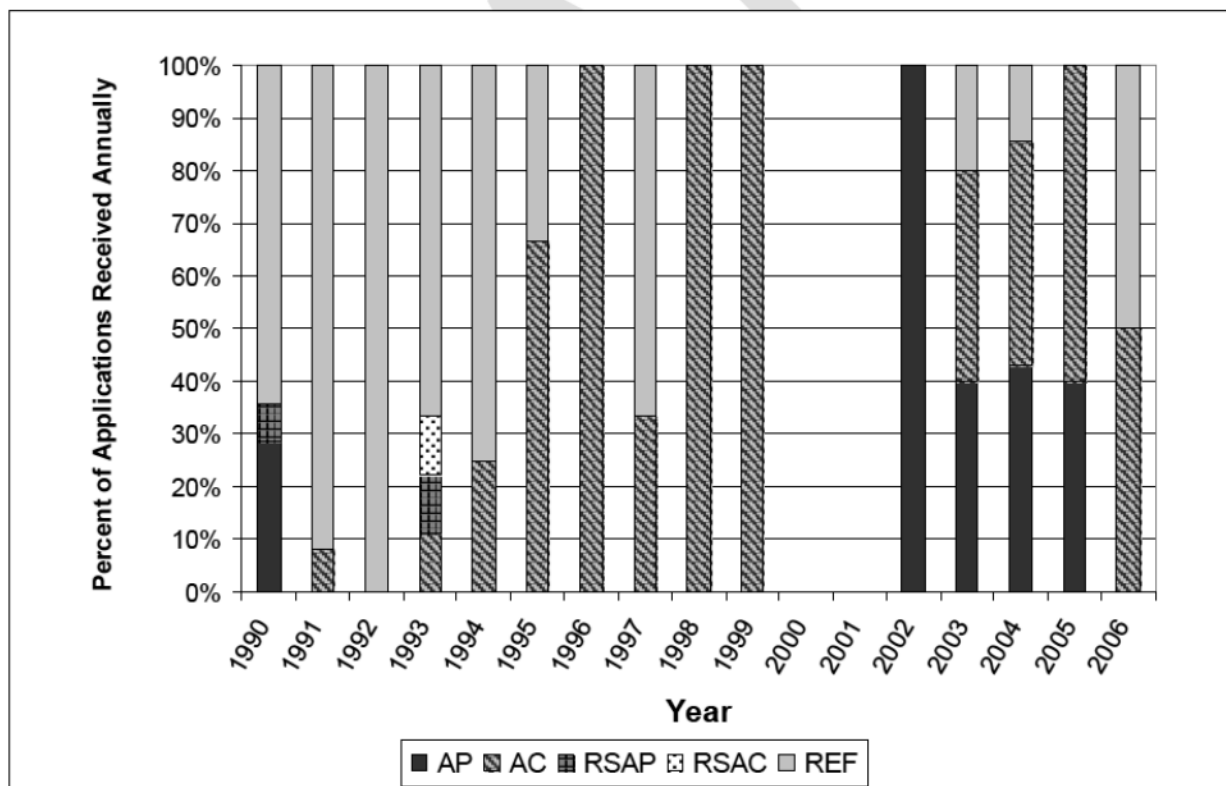
Decisions for approving subdivision can be one of four types (Figure 6). This figure indicates the frequency of each decision on applications received between 1990 and 2006. These abbreviations are used to summarize these decision types in Figure 7.

The majority of applications were refused. Of all approved applications, 56% were approved with conditions.

Figure 6: ALC Decision Categories

1990-2006 Decision	Abbreviation	Total
Refused	REF	45
Approved as Proposed	AP	15
Approved with Conditions	AC	21
Refused as Submitted; Approved Alternate Proposal	RSAP	2
Refused as Submitted; Approved Alternate Proposal with Conditions	RSAC	1

Figure 7: ALC Decision by Year and Type (as a percent of applications received annually)



7. Conditions for Approval

A variety of conditions were noted on approved applications. The condition of “proof of intent to develop lot for farm purposes” was cited only once. As subdivision in the ALR should seek to protect or enhance agriculture, requiring proof of intent to subdivide the lot for farm purposes would be a useful policy tool in considering future applications. A list of all conditions applied to approvals can be found in Appendix B.



Conditions applied at the time of subdivision approval should be used to encourage the development of agriculture on subdivided lots:

- **Post bond at the time of approval until a farm is developed**
- **Require proof of intent (i.e. farm plan) to develop the lot for farm purposes**
- **Restrict the development of an additional house until a farm is established**
- **Place a covenant on the new lot requiring it to be used for farming purposes**

8. Lot Size of Approved Parcels

Only approved parcels were considered for this analysis. Of 36 applications, two involved the creation of 2 parcels, so a total of 38 parcels were analyzed.

Table 2 summarises parcels approved for subdivision by size range. The parcels shown are approvals in decision only, as they have not necessarily been implemented.

The number of parcels in the 2 to 4 hectare size range increased following approval. This is attributed to the 15 homesite severance applications that were approved.

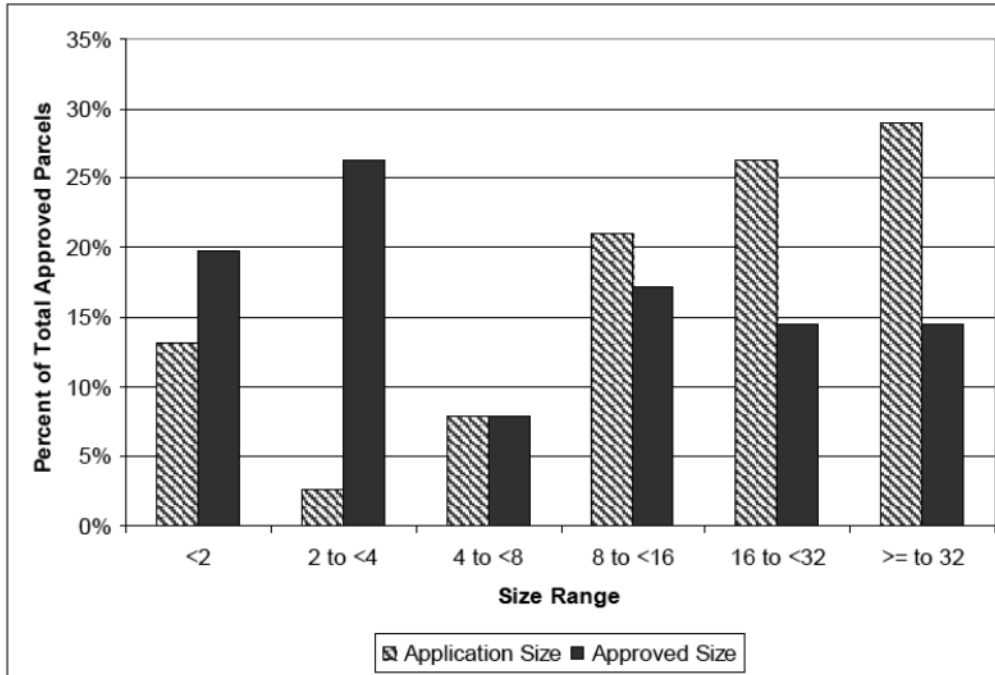
As might be expected, the largest parcels decreased as a percentage of the total (Figure 8). Approvals on the larger parcels will typically leave the parent parcel within the larger size class and create a new parcel in a smaller size class.

Table 2: Parcels Approved as Proposed or Approved with Conditions - 1990 to 2006

Size Range (Ha)	At Time of Application		After Approval	
	# of Parcels	% of Total	# of Parcels	% of Total
<2	5	13%	15	20%
2 to <4	1	3%	20	26%
4 to <8	3	8%	6	8%
8 to <16	8	21%	13	17%
16 to <32	10	26%	11	14%
32+	11	29%	11	14%

Parcels less than 8 hectares are being approved in the ALR. This impacts agriculture by limiting the land base available for operations requiring large lots, and affects the affordability of developing new farms. For further discussion of this topic, please see *Part E: Lot Size, Property Value, and Agricultural Activity*.

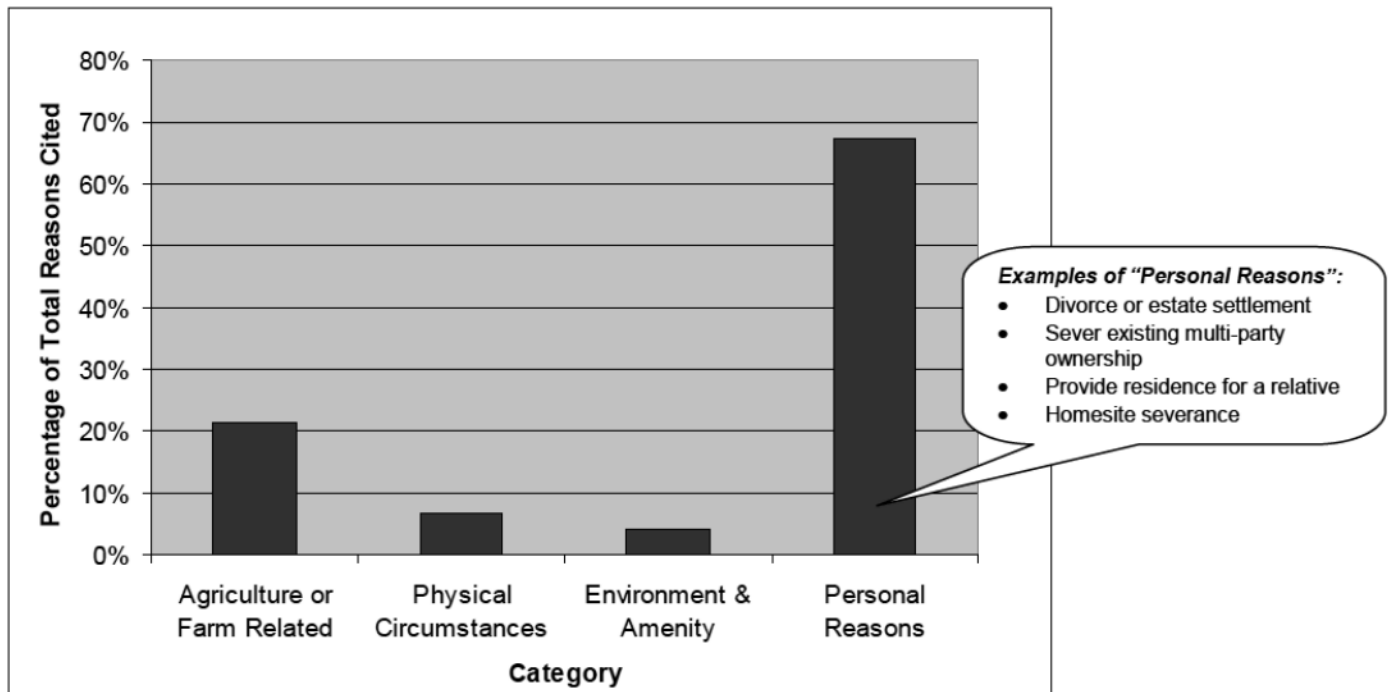
Figure 8: Parcel Size at Time of Application compared to Approved Parcel Size (1990-2006)



Motivation for Subdivision and Resulting Decisions

Applicant motivations for proposing subdivision are noted at the time of application. Reasons are summarised into four broad categories: Agriculture/ Farm Related, Physical Circumstances, Environment & Amenity, and Personal Reasons (Figure 9). The majority of reasons cited are personal rather than agricultural. Table 3 summarises the top five motivations for subdivision cited by applicants. Appendix C contains a full list of these reasons.

Figure 9: Applicant Motivation for Subdivision



None of the top five reasons were to promote or enhance agriculture. Overall, six applicants cited their reason for application as “to expand or intensify the existing farm use”, and 2 cited that subdivision was “to provide financing for agricultural improvements.”

More than 2/3 of applications made for personal reasons were refused. Of the personal reasons given on approved applications, 6 were for homesite severance.

Two-thirds of applications motivated by agricultural reasons were approved for subdivision. Four of these were not seeking to improve or enhance agriculture, but to reduce holdings of poor or lesser agricultural potential.

Table 3: Applicant Motivation for Subdivision - Top Reasons		
Applicant Reason	No. Times Cited	% of Total Citations
Residence for a relative	26	22%
Reduce holdings by future sale	14	12%
Homesite severance	14	12%
Sever existing multi-party ownership	9	8%
Land has poor agricultural potential	8	7%

Table 4: Motivation and Decision Result		
	Approved	Refused
Personal Reasons	15	37
Agricultural Reasons	16	8
Physical Circumstances	5	0
Environment and Amenity	3	0
Total Applications	39	45

Part C: Lot Size and Land Use

1. Change in Parcel Size: 1997-2007

This section examines changes in mean lot size in the Comox Valley between 1997 and 2007. BC Assessment records of ALR parcel sizes from 1997 and 2007 were used for this analysis⁵. Only the Courtenay Rural ALR parcels were analysed. In 2005 and 2006 several large upland forest parcels were excluded from the ALR in this area; these parcels were not included in the analysis.

Table 5 shows the number of parcels by size category in the Courtenay Rural ALR and the average parcel size for these two years. The average parcel size has decreased by 1.6 hectares over this 10-year period.

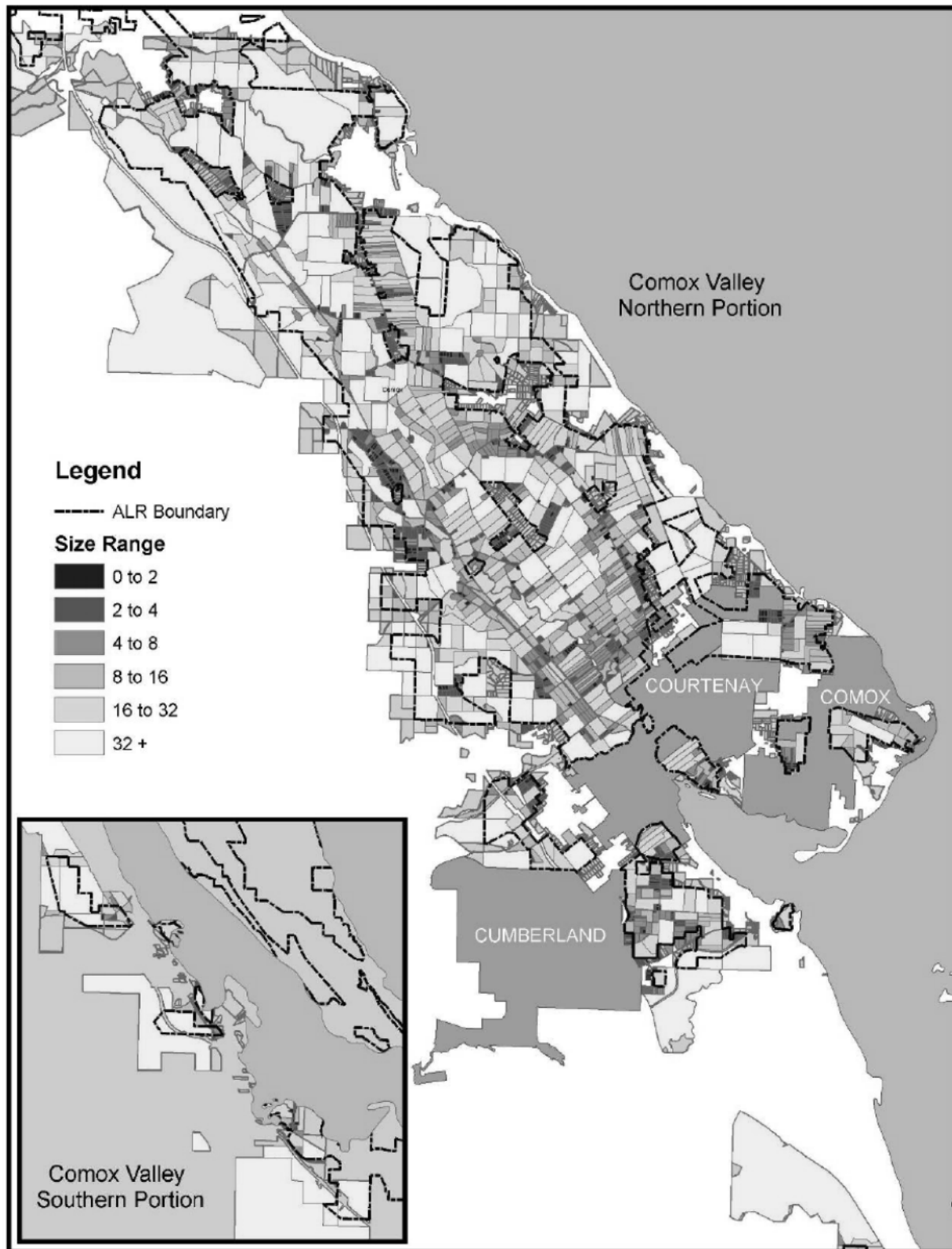
The number of parcels in the smaller size categories increased, while the number of large parcels (greater than 16 hectares) decreased. These changes may be attributed in part to subdivision, but may also be affected by exclusions, parcel consolidations and ALR boundary adjustments. BC Assessment tracks mobile homes as separate parcels for taxation purposes, which may account for the increase in the number of smaller parcels and may not be associated with an increase in subdivision applications.

The current distribution of parcels by size range in the Comox Valley ALR is illustrated in Map 2 on the following page.

Table 5: Parcel Count by Size Range Courtenay Rural ALR (1997-2007)			
	1997	2007	
Parcel Size (ha)	Number of Parcels	Number of Parcels	Change
<2	315	338	+ 23
2 to <4	349	363	+ 14
4 to <8	285	289	+ 4
8 to <16	234	243	+ 9
>16	426	384	- 42
Total	1609	1617	+ 8
Average parcel size (ha)	14.5	12.9	- 1.6

⁵ The analysis includes all ALR parcels in the Courtenay Rural jurisdiction.⁵

Map 2: Parcel size ranges within the study area (2007).



2. Change in Agricultural Land Use on all Parcels: 1990-2007

This section examines the relationship between agricultural land uses and subdivision during the period from 1990 to 2007. Changes in land use were determined based on information originally supplied on the subdivision application⁶ and, information acquired through a land use inventory undertaken in 2007. Table 6 compares the changes in agricultural land use on properties that were refused subdivision versus those that were approved.

Table 6: Change in Agricultural Land Use (1990-2007)		
	Decision	
	Refused	Approved
Total number of parcels	39	65
Parcels with agriculture at time of application	16	35
→ Parcels that lost agriculture since application	-1	-16
→ Parcels that gained new agriculture since application	+12	+6
Parcels with agriculture in 2007	27	25
Percent change in agricultural use since application	+69%	-29%

Of the 39 parcels where subdivision was refused, only one lost an agricultural use that was present at the time of application. By 2007, 12 of these parcels had gained new agricultural use. On the 65 parcels approved for subdivision there was a 29% net loss of agriculture.



Agriculture is more enduring on parcels where subdivision has been refused; these parcels are more likely to retain their original agricultural uses and gain new ones than those parcels approved for subdivision.

Table 7 summarises subdivided parcels that had agricultural land use at the time of application based on size range. Most of the parcels that retained their agricultural land use are 8 hectares or larger in size while most parcels that lost an agricultural land use are less than 8 hectares



Agricultural land uses appear to be more readily retained on larger parcels.

Table 7: Parcels with Agriculture at Time of Application Compared to 2007 (Subdivisions Approved and Implemented)				
2007 Parcel Size	Kept Agriculture		Lost Agriculture	
	No.	%	No.	%
0 to < 8 ha	3	25%	10	71%
8+ ha	9	75%	4	29%
Total	12	100%	14	100%

⁶ As part of the decision-making process for subdivision applications, the ALC collects relevant information about each property including land use at the time of application.

3. Change in General Land Use on Subdivided Parcels: 2002-2007

Land use data collected by MAL for 2002 and 2007 was compared in order to assess land use changes on subdivided parcels⁷. Table 8 summarises changes in land use on parcels that were subdivided between 2002 and 2007. Parcels shaded grey show a change in land cover. Due to limited data available on land use, the sample size is small which makes it difficult to draw conclusions. **However, this methodology could be readily applied in other areas where land use inventories are available for consecutive years; this approach would be invaluable in helping to improve the understanding of the impacts of subdivision on agricultural activity levels.**

Table 8: Change in General Land Use on Subdivided Parcels (2002-2007)				
	2002 Land Use (7 parcels)	2007 Land Use (15 Parcels)		
	Parent Parcels	Subdivided Parcels		
		Parcel 1	Parcel 2	Parcel 3
Approval 1 Size (ha)	Agriculture 52.4	Agriculture 50.3	Residential 2.1	n/a
Approval 2 Size (ha)	Agriculture 25.5	Agriculture 17	Residential 8.5	n/a
Approval 3 Size (ha)	Forestry 47.6	Forestry 38.5	Not in Use 9.1	n/a
Approval 4 Size (ha)	Hobby Farm 4.1	Hobby Farm 2.03	Residential 2.07	n/a
Approval 5 Size (ha)	Land in Transition 8.6	Agriculture 1.7	Not in Use 3.7	Not in Use 3.2
Approval 6 Size (ha)	Not in Use 13.5	Not in Use 11.67	Agriculture 2.41	n/a
Approval 7 Size (ha)	Residential 10.8	Residential 8.8	Residential 2.0	n/a

The 7 parcels approved during this time were subdivided into 15 different parcels by 2007. Subdivision only resulted in two parcels being brought into agriculture use. Four of the newly subdivided parcels are primarily residential in use (Table 8).

On subdivided parcels, the total number of hectares in agriculture use went from 82 hectares in 2002 to 73.4 hectares in 2007, resulting in a 10.5% decrease in the amount of land in production.

⁷ Refer to *Ag Focus: A Guide to the Land Use Inventory* for more details on the survey methodology used.

Part E: Lot Size, Property Value, and Agricultural Activity

It is generally accepted that smaller parcels garner a higher price per hectare than larger parcels. This may be a factor in limiting future agricultural use on smaller, subdivided parcels. This pilot study briefly examined sales values for properties in the Comox Valley ALR that received subdivision applications and were sold between 1990 and 2007.

Table 9 indicates the average sale value per hectare for properties by size.⁸ Sales values were adjusted to 2007 dollars using an inflation calculator from the Bank of Canada.⁹

The average sales value of properties less than 4 hectares is almost 8 times that of properties larger than 16 hectares. This may be a result of smaller parcels having a larger residential footprint or other improvements relative to the total size of the parcel. It may also be related to the high demand for rural residential properties.

In addition to looking at the relationship between parcel size and property value, the study briefly examined the type of agricultural activity taking place on small (less than 8 hectares) and large (8 hectares or more) parcels. Forage operations are the predominant agricultural activity found in both size classes. Hobby scale livestock and horse operations are more prevalent on parcels less than 8 hectares. There were more field vegetables, dairy, berry and tree farms on the larger parcels. Intensive type operations such as poultry and nursery seemed to be equally distributed amongst lot sizes and did not predominate on smaller lots.

Table 9: Average Sale Value per Hectare

Size Class	Average Sale Price per Hectare	Number of Records
2 to <4	\$ 84,802	26
4 to <8	\$ 45,160	22
8 to <16	\$ 31,437	24
>=16	\$ 10,861	42

⁸ Sales by year and value were obtained for all parcels in the study area. "Reject" records indicated a sale below market value or unsuitable for sales analysis were excluded. Over these 5 years, a total of 41 sales suitable for analysis took place on subdivided parcels. Information on parcel size at the time of sale was available for 25 of the 41 parcels. Except for 2002 sales, parcel sizes for individual sales were obtained from BC Assessment databases. Parcel sizes for sales in 2002 were obtained using GIS and the roll numbers were cross referenced with parcel size information in the 2002 cadastre.

⁹ The Inflation Calculator uses the Consumer Price Index to adjust values to reflect annual inflation rates. The CPI is calculated by tracking the retail prices of a variety of consumer goods from an average household's expenditure; these include food, housing, transportation, furniture, clothing, and recreation. Prices are then measured against a base year (in this case, 2007) and adjusted accordingly.

Part D: Inter-Agency Decisions on Subdivision Decisions

While the ALC makes the final decision with regard to approving or refusing subdivision in the ALR, the following agencies provide recommendations to the ALC on the subdivision applications: Regional District Board, Community Planning Services, and CSRD Agricultural Advisory Committee. A comparison between the recommendations of different agencies and the decisions of the ALC was undertaken to determine the level of agreement between all agencies with regards to subdivision applications and approvals.

1. Support for Subdivision Applications by Agency

While the ALC may approve or refuse applications, the other agencies will forward individual recommendations of “no comment”, “recommend refusal”, “no objection”, or “support” for each subdivision application.¹⁰

Table 10 includes only applications where an agency indicated “support” for the proposal and/or the ALC approved the proposal.¹¹ The ALC’s support for subdivision (as a percentage) is highest at 46% and the AAC’s support is lowest at 19%.

	No. Subdivision Applications Reviewed	Percentage of Subdivision Applications Supported
Agricultural Land Commission	84	46%
Regional District of Comox-Strathcona	79	30%
Community Planning Services	82	20%
CSRD Agricultural Advisory Committee	68	19%

¹⁰ The CSRD Agricultural Advisory Committee was established in 1996; the number of subdivision applications reviewed has been adjusted to reflect this.


¹¹ The CSRD Community Planning Services reviewed support for subdivision applications by agency between 2000 and 2005. These results can be found in Appendix D – findings are similar as noted in section 2 here.


2. Inter-Agency Decisions on Applications

Table 14 compares recommendations on jointly reviewed applications.

Agreement was reached on 46% of the 61 applications reviewed by all four agencies. This may be due to differing perspectives and mandates of each agency.

Table 11: Agreement on Applications Reviewed		
Agency	No. of Applications Reviewed	Agreement on Recommendations (%)
Regional District & Community Planning Services	70	77%
Regional District & Agricultural Land Commission	76	81%
Community Planning Services & Agricultural Land Commission	77	81%
Community Planning Services & CSRD Agricultural Advisory Committee	68	74%
Regional District & CSRD Agricultural Advisory Committee	65	66%
Agricultural Land Commission & CSRD Agricultural Advisory Committee	68	63%
All Agencies	61	46%

 **The highest level of agreement (81%) occurred between the ALC and the CSRD, and the lowest level of agreement (63%) occurred between the ALC and the CSRD AAC.**

 **Further investigation should be undertaken to understand how decision criteria differ by agency.**

3. Reasons for Agency Recommendations

When making recommendations about subdivision applications, each agency generally provides a rationale to support their recommendation. To understand the similarities and differences between these recommendations, the reasons were categorized and summarized. Each agency may provide more than one reason for their recommendation on an application; the top 3 reasons for refusal and approval were summarized. Appendix D has a complete list of cited reasons. *Note: Regional Agrologist comments were not analysed as recommendations were not made in every case.*

Reasons for Recommending Refusal by Agency

The supporting rationale for agency recommendations provides some insight into the decision making process. For example, Community Planning Services and the Regional District Board both considered the consistency of the subdivision proposal with the existing regulatory framework, while the ALC and Agricultural Advisory Committee did not. Agricultural potential was a key reason for refusing subdivision by all agencies except the Regional District Board.

Reasons for Recommending Approval/Support

☒ A common reason for agency support for subdivision is that the applicant is eligible under the homesite severance policy (HSP). Another common reason for supporting subdivision is when the subject property is deemed to have poor agricultural suitability in terms of either lot configuration or soil capability. It should be kept in mind that many agricultural activities do not rely on soil capability (e.g. poultry production, greenhouses, mushroom farms). Although the Comox Valley's agricultural sector is almost exclusively soil-based, this is not the case in other areas of BC, particularly in the Lower Mainland. **In these locations, agricultural suitability should not be a factor in considering cases of subdivision.**

Reasons for Recommending No Objection¹²

In some instances where the proposal is seen to have no negative impact on agriculture, this is given as a reason for providing no objection to the proposal. However, given the policy context of the Comox Valley Agricultural Plan (2002) and Official Community Plan (1998) which seek to protect and enhance agricultural land, particularly with regard to the retention of large agricultural parcels, it may be more appropriate to demonstrate that the proposal would protect or enhance agriculture rather than simply have no negative impact.

☒ **Given the existing policies that support the protection of agricultural lands and the retention of large parcels, agencies should make clear recommendation of either support or refusal. It may be more appropriate to demonstrate that proposals will protect or enhance agriculture rather than simply have no negative impact.**

¹² Each agency may state "no objection" to the proposal rather than direct support or refusal. The ALC is not considered in this section because their role enables them only to refuse or approve applications.

Part F: Recommendations

1. Improve the Tracking of Subdivision Applications

- ☒ Applications for subdivision and non-farm use applications have the same application code making it difficult to track subdivision. **To address this, each type of application should be recorded using a distinct code.**

Information supplied in the Application Tracking System (ATS) database is inconsistent. There are gaps in certain time periods and applications. This study examined applications received between 1990 and 2006; in several circumstances, the proposal description, decision date, or other information was missing from the ATS database record.

- ☒ **A consistent record of proposals and decisions in the database would aid in more effective and efficient future studies.**

Other than the legal description (e.g. Lot A, Block 29, District Lot 46, Plan 4000) no consistent parcel identifier is provided in the file for each application. This study used the available address, parcel identifier, and hard copy map information to identify each parcel with an application in the 2007 CSRD cadastre.

- ☒ **By consistently recording (in the ALC file) the Jurisdiction Roll Number assigned to properties by BC Assessment, the parent parcels and new parcels created through subdivision would be easier to identify for study purposes.**

The minutes found in the hard copy of the ALC files record the decision made on each application but do not record when approved subdivisions are implemented. For this study, a hard copy map of each proposal was compared to the 2007 cadastre to determine if approved subdivisions were implemented. **A consistent record of subdivision implementation, parent parcel identifiers, and new parcel identifiers would greatly enhance the ability to study subdivision and land use.**

- ☒

This study only examined subdivision within the Comox Valley rather than the entire CSRD.

- ☒ **Future studies should investigate parcel size and agricultural land use within a complete jurisdiction (e.g. regional district, municipality, electoral area) to simplify analysis and provide a complete picture of land use and lot size in the region.**

2. Develop a Coordinated System to Record Land Use

Both the land use inventory used by MAL and the ALC files record land use information for properties in the Agricultural Land Reserve. In the case of the ALC, land use is only investigated if an application is made on a property. In the interest of examining the relationship between land use and lot size, the land use at the time of application for subdivision can be valuable information. At present the ALC and the land use inventory are not coordinated and do not have consistent categories for recording land use. **A coordinated system of recording specific land uses and cover types at the time of application could be of benefit in terms of future study and decision making processes.**

- ☒

3. Develop Decision-Making Criteria for Subdivision Applications

A number of agencies provide the ALC with recommendations on subdivision applications. When recommendations were analyzed as part of this study, there was limited agreement between agencies on recommendations involving subdivision.

A variety of reasons were cited by the various agencies in their recommendations for each application. In several cases, “no comment” was the only response given. Furthermore, it was difficult to ascertain to what degree each agency applies criteria in their recommendation process.

☒ **If all agencies developed and used a consistent list of criteria, this could facilitate more consistent decision making by all parties and ensure increased transparency in the decision-making process.**

4. Investigate Consistency of Local Government Policies and Decisions

Local governments are the initial recipients of applications for subdivision on ALR lands. While they do not have the authority to approve subdivision in the ALR, they can refuse the application based on their current planning policy and zoning context. If a local government does not want to make a decision (i.e. refusal) on an application, they can forward it to the ALC.

The MAL Regional Agrologist indicated that since 2006 the Comox-Strathcona Regional District has been reviewing applications and applying their policies before forwarding subdivision applications to the ALC. As other local governments around BC have agricultural plans with similar policies, this is a practice that should be encouraged. Local government review and vetting of ALR applications as to their consistency with the local policy context not only streamlines the ALC’s review process, it further encourages local governments to take an active role in protecting and promoting agriculture.

☒ **Further study is needed to understand to what degree local governments are reviewing subdivision applications, the criteria they are using in the decision-making process, and how successful they are at achieving the goals and objectives outlined in their plans with respect to subdivision in the ALR.**

5. Encourage Agriculture on Existing Small Lots

Small lots provide opportunity for a variety of intensive agricultural uses and are also conducive to direct farm marketing. However, they are not conducive to more extensive types of agriculture and tend to attract more urban-oriented buyers, which drives up the price of small lots. This can create a financial barrier for farmers who may be interested in starting (or expanding) agricultural operations on land that is made available through subdivision and sale.

Local governments can undertake a number of steps to promote agriculture on existing small lots and discourage non-farm uses from dominating these lots types. Below is information drawn from existing local government small lot policies (Agricultural Plans from the Regional District of Central Okanagan (RDCO), the District of Summerland, and the District of North Cowichan).

Reduce Speculation for Urban Uses

Some policies focus on reducing the type of speculation that encourages country estates. For example, recommendations from the RDCO Agriculture Plan (2005) suggest that local governments can work with the Real Estate Board to cultivate a better understanding of the

importance of the ALR for food production. This Plan also suggests that land use policies can help reduce residential speculation by clearly promoting agricultural uses rather than implying potential for urban development in the ALR.

Reduce the Residential Footprint

Both the RDCO and the Summerland Agricultural Plans encourage using regulation to reduce the size of residences and implement setbacks. This is intended to reduce the fragmentation of agricultural parcels by confining non-farm uses to the edge of the property, eliminating the need for new road or driveway access, and providing suitable siting for homesite severances that leave the agricultural land intact. Limiting the size of the residential developments also serves to ensure the property remains affordable for potential farmers. In instances where a homeowner wishes to vary their building size, an agricultural impact assessment is recommended to enable local governments to determine how this might impact the agricultural potential of the property.

Encourage Parcel Amalgamation and Leasing

The Summerland Agricultural Plan (2005) recommends consolidating smaller parcels into larger ones where possible to give farmers greater access to economy of scale and reduced exposure to financial risk. It is suggested that local governments review and streamline their parcel amalgamation procedures in order to encourage this practice. In Summerland many of the small parcels are not farmed by the resident, but are leased out for agricultural purposes. The Summerland and North Cowichan Agricultural Plans suggest that local governments encourage small lot farming by providing a registry of farmland available for lease. Through leases farmers unable to make the investment required for purchase may still be able to access agricultural land.

Develop Support Programs

The RDCO Agricultural Plan suggests the development of support programs at the local government level to re-establish agriculture in areas which have become inactive. The Orchard Replant Program is a local program where the local government provides financial assistance to enhance the viability of new orchard operations on ALR land no longer in use. While this recommendation is not specifically targeted to small lot agriculture, it could be adapted to suit this purpose. The North Cowichan Agricultural Plan (2001) recommends that local government play a role in identifying commodities suitable to small lots in that area. Also recommended is the development of extension/training programs for existing and prospective small lot farmers to train them in such things as business management and direct marketing on small lots.

Change Zoning Bylaws to Support more Diverse Agricultural Activity

The North Cowichan Agricultural Plan recommends review and changes to the zoning bylaw to encourage agriculture on small lots. It suggests that zoning applied to ALR and non-ALR agricultural land be modified to support production of a more diverse product base, allow for a wider variety of processing and direct marketing facilities, and create opportunities for combined or cooperative farm product processing and sales. It also suggests allowing a greater diversity of small non-farm uses to support the household income of small farmers with limited land base.

Part G: Conclusions

This study was undertaken as a joint venture between the Ministry of Agriculture and Lands and the Agricultural Land Commission in the summer of 2007. It examined the regulatory context, land use, parcel size, sales value, and recommendations made by different agencies with regard to subdivision applications in the Comox Valley ALR.

A number of key findings arose from the study:

- Local government policy on subdivision and minimum lot size set out in the zoning bylaw did not appear to have a significant influence on the decision-making process when it came to approving / denying subdivision.
- The majority of subdivision applications were refused.
- Applicant motivation for subdivision rarely had to do with a desire to improve agricultural capability.
- Average parcel size decreased by 35% over the 10 years studied.
- Parcels refused subdivision are more likely to retain or gain an agricultural use than parcels approved for subdivision.
- Interagency agreement on whether to approve subdivision was 46%.

Some of the recommendations that emerged from the study include:

- The ALC Application Tracking System should include the property's Jurisdiction Roll Number on subdivision applications.
- Agencies should develop and apply consistent decision criteria to enhance transparency in decision-making and improve inter-agency agreement on subdivision decisions.
- All agencies should refer to existing local government policies regarding agriculture and parcel size as a supportive framework for considering requests for subdivision in the ALR.
- Local governments should undertake a number of steps to promote agriculture on existing small lots.

Recommendations about how to approach future studies on land use and lot size in the ALR are also included. While this is a small sample size, the methodology employed has proven to be a useful means of improving understanding of how land use might be affected by lot size. This approach could be applied to other areas where there are more subdivision applications and the land use inventory information is available over a longer period of time. A broader study would provide a bigger snapshot of the relationship between lot size and agricultural activity and ultimately aid in future decision-making processes related to subdivision of land in the ALR.

**Appendix A: Average Parcel Size by Zoning Designation
(Parcels Partially or Completely within the ALR)**

Parcels Completely Within ALR			
Zoning Designation	Min. Lot Size (Ha)	Parcel Count	Average Area (Ha)
CA	0.4047	1	0.83
IL	1	5	0.98
PA-1	0.0325	9	1.37
RR-1	20	1	37.58
RU-1	8	19	17.61
RU-8	8	3	2.74
RU-ALR	8	1275	10.79
UR-400ha	400	1	43.73
UR-40ha	40	35	19.93

Parcels Partially Within ALR			
Zoning Designation	Min. Lot Size (Ha)	Parcel Count	Average Area (Ha)
C-1	0.2023	11	0.53
C-2	1	1	0.87
CR-1	2	89	2.09
CR-4	2	12	1.53
CR-5	8	1	0.46
IH	2	3	5.30
IL	1	13	3.34
PA-1	0.0325	3	3.22
R-1	1	1	0.16
RM	0.4047	1	0.20
R-RU	0.8	127	1.30
RU-1	8	12	81.29
RU-20	20	40	46.09
RU-8	8	184	5.05
RU-ALR	8	47	41.73
TC-2	0.4047	1	3.94
TU-1	2	1	0.01
UR-400ha	400	22	176.09
UR-40ha	40	44	59.53

Appendix B: Categories of Conditional Approvals

<i>Condition</i>	<i>No. Times Cited</i>
Standard Homesite Severance terms and conditions.....	9
Inclusion of new land into the ALR.....	3
Livestock fencing of the newly subdivided parcel	3
Size of parcel conditional on Ministry of Health approved size for septic disposal.....	3
Consolidation of some or all of an adjacent property with the subject property	3
Approval in lieu of any future consideration under the homesite severance policy	2
Park acquisition of some of the subject property by Local Government.....	1
That a covenant be registered	1
No road access to be granted to the subdivided parcels.....	1
Removal of a second or otherwise non-compliant dwelling.....	1
Bond to ensure proposed improvements are made.....	1
Construction of safe vehicle access to the parcel.....	1
Setbacks specified by the ALC	1
Proof of intent to develop lot for farm purposes.....	1
Time constraint on subdivision completion 3 years from approval date	1

Appendix C: Applicant Motivation for Subdivision Proposals

a) Agriculture or Farm Related

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
PP.....	Land has poor agricultural potential	8
EEU.....	Expand or intensify existing farm use	6
SAF.....	Sale to agent for farm use	4
FF.....	Future farm use.....	4
FAI.....	Financing for agricultural improvements.....	2
SF.....	Separate two existing farm operations	1

b) Physical Circumstances

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
B.....	Subdivision along the ALR boundary	2
RA.....	Reduce alienated or restricted access portions of the subject property.....	2
ROW.....	Subdivision along road dedication or right-of-way.....	2
TS.....	Title for lands severed by highway development.....	2

c) Environment & Amenity

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
EH.....	Creation of an area for environmental habitat, ESA or EHMA	3
P.....	Park dedication	2

d) Personal Reasons

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
RR.....	Residence for a relative	26
HS.....	homesite severance.....	14
RH.....	Reduce holdings by future sale	14
SO.....	Sever existing multi-party ownership.....	9
E.....	Estate settlement.....	3
RD.....	New residential development in the ALR, not for applicant or relative	3
RU.....	Residential use, not for applicant or relative.....	3
SPC.....	Separate personal and corporate finances.....	2
DS.....	Divorce settlement.....	2
REU.....	Relocate existing use on property or to another property	2
SE.....	Septic field expansion.....	1

Appendix D: Reasons for Recommendation/Decision by Agency**C1: Agricultural Land Commission****ALC - Refusal Reasons**

Code	Reason	No. Times Cited
RAP	Reduces agricultural potential	27
GAC	Good agricultural capability or potential in subject property's present state	19
SLI	Proposal represents a small lot intrusion into the ALR	8
ASL	Could negatively impact or preclude ag development of surrounding lands	6
RAC	Could increase residential/agricultural conflict	5
NC	No comments given	2
SP	Approval would set a precedent and/or increase speculation	2
HTL	Homesite too large/excessive proposed lot size	1

ALC Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Reduces Agricultural Potential	27	38%
Good Agricultural Potential or Capability	19	27%
Proposal Represents a Small Lot Intrusion into the ALR	8	11%

ALC - Approval Reasons

Code	Reason	No. Times Cited
NC	No comments given	11
NNI	Proposal has no negative impact on agriculture	5
PAC	Poor or lesser agricultural capability	5
SB	Significant barrier to farming parcel as a single unit	5
RSA	Remnant suitable for agriculture	4
BTA	Proposal represents a benefit to agriculture	3
BPE	Building permit error (special case)	1
EFC	Extenuating family circumstances (special case)	1
EHS	Eligible under homesite severance policy	1
PA	Park acquisition appropriate	1
PSQ	Poor soil quality as a reason to allow larger homesite	1

ALC Top 3 Reasons for Approval		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Proposal has No Negative Impact on Agriculture	5	11%
Poor or Lesser Agricultural Suitability	5	11%
Significant Barrier Exists to Farming Parcel as a Single Unit	5	11%

C2: Regional District Board**Board Refusal Reasons**

Code	Reason	No. Times Cited
NC	No comments given	15
APR	Board recommends alternate proposal not involving subdivision	5
MLR	Recommend that a larger remnant be maintained	4
PPIR	Proposed parcel size is inconsistent with the regulatory context	3
RAP	Reduces agricultural potential	1

Regional District Board Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Recommend alternate proposal not involving subdivision	5	18%
Recommend that a larger remnant be maintained	4	14%
Proposed parcel size is inconsistent with existing regulatory context	3	11%

Board Approval Reasons

Code	Reason	No. Times Cited
NC	No comments given	12
PA	Park acquisition appropriate	2
MLR	Recommend that a larger remnant be maintained	2
EHS	Eligible under homesite severance policy	2
BTA	Proposal represents a benefit to agriculture	1
EFC	Extenuating family circumstances (special case)	1
EH	Environmental Habitat Mitigation Area creation is acceptable	1
FC	Approval in lieu of any future consideration under the HSP	1
HI	Development of highway interchange acceptable	1
PI	Proof of intent to develop lot for farm purposes	1
PPZ	Recommend that proposed parcel adhere to mls in zoning bylaw	1

Regional District Board Top 3 Reasons for Support		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Applicant is eligible under the Homesite Severance Policy	2	8%
Recommend that a larger remnant be maintained	2	8%
Park acquisition is appropriate	2	8%

Board No Objection Reasons

Code	Reason	No. Times Cited
NC	No comments given	19
EH	Environmental Habitat Mitigation Area creation is acceptable	2
EHS	Eligible under homesite severance policy	2
MLR	Recommend that a larger remnant be maintained	1

Regional District Board Top Reasons for No Objection		
<i>No Objection Reason</i>	<i>No. Times Cited</i>	<i>% of all No Object Citations</i>
Environmental Habitat Mitigation Area creation is acceptable	2	8%
Applicant is eligible under the Homesite Severance Policy	2	8%

C3: Community Planning Services

CPS Refusal Reasons

Code	Reason	No. Times Cited
RAP	Reduces agricultural potential	23
PPIR	Proposed parcel size is inconsistent with existing regulatory context	18
GAC	Good agricultural capability or potential in subject property's present state	12
ASL	Could negatively impact or preclude ag. development of surrounding lands	7
RAC	Could increase residential/agricultural conflict	6
SP	Approval would set a precedent and/or increase speculation	6
APR	Recommend alternate proposal not involving subdivision	5
NBA	Not in the best interests of agriculture	5
SLI	Proposal represents a small lot intrusion into the ALR	3
ASP	Recommend alternate subdivision proposal	3

Community Planning Services Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Reduces agricultural potential	23	26%
Proposed parcel size is inconsistent with existing regulatory context	18	20%
Good Agricultural Potential or Capability in Property's Present State	12	14%

CPS Approval Reasons

Code	Reason	No. Times Cited
NNI	Proposal has no negative impact on agriculture	5
EHS	Applicant is eligible under the homesite severance policy	3
NC	No comment given	3
PAC	Poor or lesser agricultural capability	3
SB	Significant barrier to farming parcel as a single unit	2
BTA	Proposal represents a benefit to agriculture	2
FC	Approval in lieu of any future consideration under homesite severance policy	1
HI	Development of highway interchange acceptable	1
PA	Park acquisition appropriate	1
PCR	Proposal is consistent with existing regulatory context	1

Community Planning Services Top 3 Reasons for Support		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Proposal has no negative impact on agriculture	5	23%
Poor or lesser agricultural suitability	3	14%
Applicant is eligible under the homesite severance policy	3	14%

C3: Community Planning Services (cont.)

CPS No Objection Reasons

Code	Reason	No. Times Cited
NNI	Proposal has no negative impact on agriculture	8
NC	No comment given	4
PPIR	Proposed parcel size is inconsistent with existing regulatory context	2
EHS	Applicant is eligible under the homesite severance policy	1
PA	Park acquisition appropriate	1
PCR	Proposal is consistent with existing regulatory context	1

Community Planning Services Top Reasons for No Objection		
<i>No Objection Reason</i>	<i>No. Times Cited</i>	<i>% of all No Object Citations</i>
Proposal has no negative impact on agriculture	8	47%
Proposed parcel size is inconsistent with existing regulatory context	2	12%

C4: CSRD Agricultural Advisory Committee Reasons

AAC Refusal Reasons

Code	Reason	No. Times Cited
GAC	Good agricultural capability or potential in subject property's present state	15
MSP	Maintain the existing single parcel	14
RAP	Reduces agricultural potential	13
PPIR	Proposal is inconsistent with the regulatory context	12
SP	Approval would set a precedent or precipitate further subdivision requests	12
HP	High priority for maintenance of the ALR	7
MP	Medium priority for maintenance of the ALR	6
NBA	Not in the best interests of agriculture	6
ASL	Could negatively impact or preclude ag development of surrounding lands	4
NC	No comments given	2
EPIR	Existing parcel size is inconsistent with the regulatory context	1
LP	Low priority for maintenance of the ALR	1
RAC	Could increase residential/agricultural conflict	1

CSRD Agricultural Advisory Committee Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Good agricultural potential or capability in property's present state	15	21%
Recommend maintaining the existing single parcel	14	20%
Reduces agricultural potential	13	18%

C4: CSRD Agricultural Advisory Committee (cont.)

AAC Approval Reasons

Code	Reason	No. Times Cited
EHS	Eligible under homesite severance policy	6
NC	No comments given	5
BTA	Proposal represents a benefit to agriculture.....	1
EH	Creation of an area for environmental habitat is an acceptable use	1
NNI	Proposal has no negative impact on agriculture	1
RSA	Remnant suitable for agriculture.....	1

CSRD Agricultural Advisory Committee Top Reason for Support		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Applicant is eligible under the homesite severance policy	6	40%

AAC No Objection Reasons

Code	Reason	No. Times Cited
LP	Low priority for maintenance of the ALR	4
EH	Creation of an area for environmental habitat is an acceptable use	2
EPIR	Existing parcel size is inconsistent with the regulatory context.....	1
HTL.....	Homesite too large/excessive proposed lot size	1
NNI	Proposal has no negative impact on agriculture	1
PAC	Poor or lesser agricultural capability	1
RAP	Reduces agricultural potential	1
SP	Approval would set a precedent or precipitate further subdivision requests.....	1

CSRD Agricultural Advisory Committee Top Reasons for No Objection		
<i>No Objection Reason</i>	<i>No. Times Cited</i>	<i>% of all No Object Citations</i>
Proposal is of Low Priority for maintenance of the ALR	4	33%
Environmental Habitat Mitigation Area creation is acceptable	2	17%

Appendix E: CSRD Staff Report - ALR Application Summary (2000-2005)

The following table was first published in a staff report by the Regional District of Comox Strathcona (2005).

Percentage of Subdivision Applications Approved by Agency 2000-2005		
	No. Subdivision Applications Reviewed	Percentage of Subdivision Applications Supported/Approved
Agricultural Land Commission	19	84%
Regional District of Comox-Strathcona	19	84%
Community Planning Services	19	63%
CSRD Agricultural Advisory Committee	18	28%

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DRAFT

Land Use Activity and Parcel Size in the ALR: A Pilot Study in Comox-Strathcona Regional District



**BC Ministry of Agriculture and Lands
Strengthening Farming Program
Internal Staff Report**

October 26, 2007

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Findings and recommendations are highlighted throughout this report.
Look for the following:



Key Finding



Recommendation

Part A: Background

1. Introduction

The size of a parcel influences the type of farm operation (e.g. poultry, dairy, berry) that can be established on it. Typically, the more extensive the farm operation, the larger the parcel needed. Smaller parcels are usually better suited to more intensive types of farming as less space is required to conduct the activity.

Currently, the BC Ministry of Agriculture and Lands (MAL) does not have a province-wide standard established for minimum lot size in the Agricultural Land Reserve (ALR) due to the variability of farming needs throughout the province. At present, there are two mechanisms that control minimum lot size and subdivision; local governments set minimum lot sizes within their zoning bylaws and if a property owner wants to subdivide their parcel (and meets the minimum lot size requirement), final approval for subdivision must come from the Agricultural Land Commission (ALC).

Subdivision of farmland into smaller parcels has its pros and cons. It can be argued that the maintenance of larger parcel sizes in regions with a limited supply of small parcels precludes more intensive production systems from occurring and limits opportunities for first time farmers to acquire farmland. However, it can also be argued that encouraging the subdivision of farm parcels does not support a wide range of agricultural activities and may be detrimental to the long term well being of a community's agriculture industry. Furthermore, the higher cost per hectare of smaller parcels can limit their affordability for those seeking to develop them for agriculture.

2. Purpose

A pilot study was undertaken by the Ministry of Agriculture and Lands and the ALC in the Comox Strathcona Regional District (CSRD) ALR to understand: the effects of subdivision on land use¹; the relationship between parcel size, property value and agricultural activity; and the inter-agency decision-making process in supporting or denying subdivision in the ALR. This study examines the direct correlation between subdivision, parcel size and agricultural land use. Other socio-economic factors that may affect agricultural use on subdivided parcels were not examined.

3. Study Area and Scope

The primary focus of this study is on ALR parcels that received application for subdivision between January 1st, 1990 and December 31st, 2006. This time frame reflects the period when records were digitally entered into the ALC's Application Tracking System (ATS) database. Future studies may wish to examine hardcopy files back to an earlier date, as subdivision was occurring in Comox Valley prior to 1990.

¹ There are many variables that can affect land use and agricultural activity levels; the scope of the pilot study is intended to identify general relationships that may exist with regard to lot size and land use/agricultural activity. In order to fully determine the reasons for different agricultural activity levels on farm parcels, more extensive research, including an in-depth survey of property owners, would be required. This is beyond the scope of this study.

For the purpose of this study, the study area is referred to as the Comox Valley and includes all ALR parcels located in the Comox-Strathcona Regional District within the Electoral Areas A, B, C, and a portion of Electoral Area D containing the former U.B.C. research farm at Oyster River.

This area was chosen for this study because:

- subdivision activity was known to be occurring in the Comox Valley;
- the sample size was manageable;
- land use and parcel size data was readily available; and,
- Comox Strathcona Regional District has a well established farming area.

The Comox Valley is home to 445 farms (Census of Agriculture, 2001). The size of the average farm is 31 hectares, and the total amount of land farmed in the region is 13,700 hectares. Farming in the CSRD typically occurs on larger parcels than on Vancouver Island as a whole. The 2001 Census of Agriculture reports that 131 farms are less than 4 hectares and 207 farms are in the 4 to 28 hectare range. The remaining farms are found on parcels larger than 28 hectares. In the Comox Valley there are a high number of small lots in the Agricultural Land Reserve. In 2007, 61% of all ALR parcels were less than 8 hectares.

The 2002 Comox-Strathcona Land Use Inventory draft report (MAL, 2005) indicates that 42% of the ALR parcels in Comox-Strathcona were being farmed at the time of the survey. Of all the parcels in CSRD the ALR 10% were alienated from farming due to residential use and or other land uses that would preclude future farming. Of the properties available for farming, 48% were not farmed and were being used for other purposes including residential and hobby farm use. The majority of farmed parcels (61%) were larger than 8 hectares. Forage production was the predominant agricultural use on these parcels.

Farmers in the Comox Valley produce a variety of crops and livestock. Cattle ranching and other livestock operations are the most common farm types in this region, followed by greenhouse, nursery, and floriculture production. Other types of farms include poultry and egg production, fruit and nut orchards, vegetable, and grain farms. In terms of area, field crops and unmanaged pasture comprise most of the farmed land in this region (Census of Agriculture, 2001).

4. Regulatory Context: Policy and Zoning affecting Minimum Lot Size

Local government policies within Official Community Plans, Agricultural Area Plans, and regulations within zoning bylaws provide direction for establishing minimum lot sizes and controlling subdivision in the ALR. The Comox-Strathcona Regional District has relevant policies and regulations within their Rural Comox Valley Official Community Plan (OCP), Comox Valley Agricultural Plan, and Comox Valley Zoning Bylaw.

Rural Comox Valley Official Community Plan (1998)

The objectives and policies in the OCP contain policy directions relating to stewardship of the agricultural resource base to promote its long-term viability. Of particular note is Section B13:

B.13 (d): The retention, protection and enhancement of lands with agricultural capability shall be supported.

B.13 (e): Consolidation of smaller parcels of agricultural land into larger, more viable agricultural units is encouraged and any reduction in land area of a viable farm operation shall be discouraged.



Local government plans can contain valuable policy direction relating to stewardship of agricultural land. This information should be consistently referred to by all agencies when making decisions on subdivision.

Comox Valley Agricultural Plan (2002)

The Comox Valley Agricultural Plan encourages future OCP revisions to develop consistency between the OCP and Agricultural Plan policies. Related policies include:

- Support no net loss of land from the ALR
- Restrict subdivision and housing development on agricultural lands
- Retain current large agricultural parcels

These recommended policies are targeted at retaining the ALR land base in the Comox Valley. As a revised OCP has not been prepared to date, it may not reflect all recommendations outlined in the Agricultural Plan.

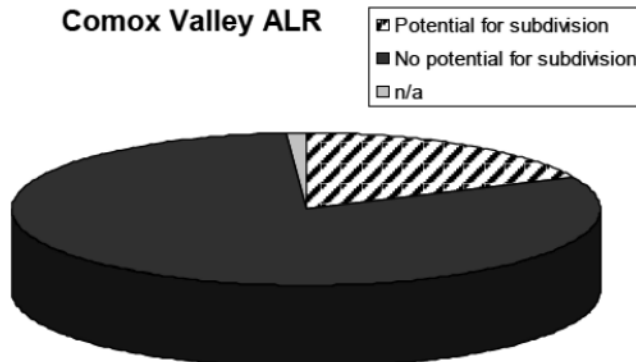
Comox Valley Zoning Bylaw (2005)

The Comox Valley Zoning Bylaw sets a number of minimum lot sizes for parcels within the ALR depending on the zoning designation. The majority of parcels have a minimum lot size of 8 hectares². Table 1 summarises all the zoning designations present on parcels completely within the Comox Valley ALR. See Appendix A for a full list of the zoning that applies to land both partially and completely within the Comox Valley ALR. Under the current zoning 18% of parcels in the Comox Valley ALR have potential for subdivision (Figure 1). This was determined by applying the minimum lot size within each zone to the 2007 Comox ALR cadastral mapping.

Table 1: Zoning of Parcels Completely within the Comox ALR

Zoning Designation	Min. Lot Size (Ha)	Number Parcels	Average Area (ha)
RU-ALR	8	1275	10.79
UR-40ha	40	35	19.93
RU-1	8	19	17.61
PA-1	0.0325	9	1.37
IL	1	5	0.98
RU-8	8	3	2.74
UR-400ha	400	1	43.73
RR-1	20	1	37.58
CA	0.4047	1	0.83

**Figure 1: Parcels with Potential for Subdivision
Comox Valley ALR**



Future changes to the OCP and zoning bylaw should consider establishing only one zone for the entire ALR as recommended by the Comox Valley Agricultural Plan.

² There are provisions set out under the ALC Act that enable these minimum lot sizes to be varied. This enables homesite severance and other Commission approvals for lots that are smaller than the zoned minimum lot size without the need for a formal rezoning process.

5. Decision Process

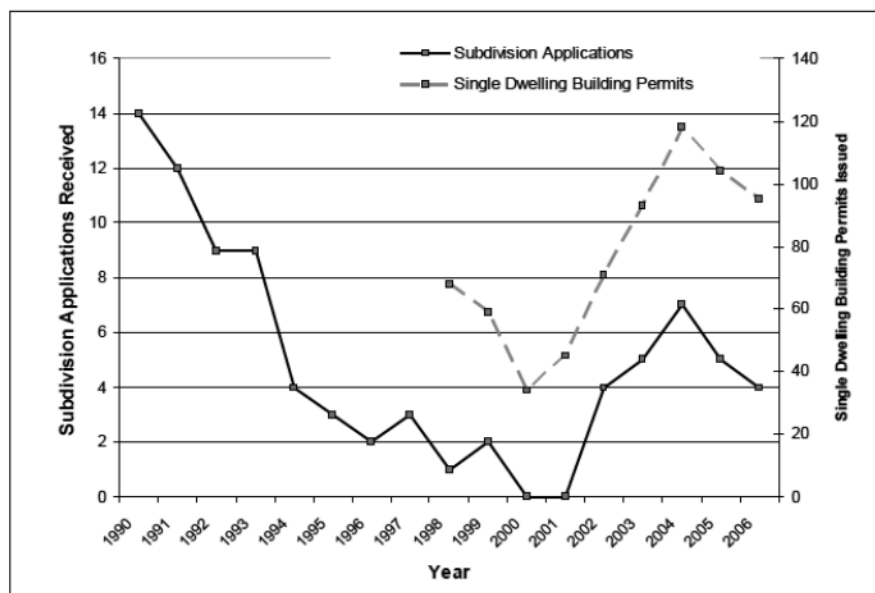
Final approval for subdivision of ALR land comes from the ALC. Subdivision applications are first submitted by the applicant to the local government. The proposals are then reviewed and can be commented on by several agencies. In the Comox-Strathcona Regional District, these agencies include Community Planning Services, CSRD Agricultural Advisory Committee, the BC MAL Regional Agrologist, and the Regional District Board. The Board can choose to refuse the application; if it supports the application, the Board must forward it to the ALC along with any comments supplied by the different agencies. In cases where a proposal is refused by the Commission, applicants can either reapply or ask that their file be reconsidered provided they offer new information. With regard to this study, no properties were applied for more than twice between 1990 and 2006. In some circumstances the ALC may apply conditions to the approved decision resulting in four types of approvals: approved as proposed, approved with conditions, refused as submitted but approved alternate proposal (on reconsideration), refused as submitted but approved alternate proposal with conditions (on reconsideration).

Part B: Results - Subdivision Applications

1. Application Trends

From 1990 through 2006, 85 applications for subdivision were made.³ The annual number of applications received varied from 0 to 14 over this period (Figure 2). In 2000 and 2001, no applications were received. The increase in applications after 2001 is consistent with overall market and economic activity in the Comox Valley during that period. This trend is consistent with numbers of single dwelling building permits issued for the rural areas of the Regional District from 1998 to 2006 (Figure 2).⁴ Market activity was low in 2000-2001, increased to 2004, and declined again after that.

Figure 2: Annual Subdivision Applications Compared with Single Dwelling Building Permits



³ One file from 1994 was unavailable; this file has been omitted and the total number of applications reviewed is 84.

⁴ This includes both ALR and non-ALR areas of the CSRD.

2. Properties with Repeat Applications

Following an initial refusal, 10 properties were subject to re-application for subdivision. Four of these were refused a second time and the remaining six were approved.

3. Applications and New Lots Approved

Of the 84 applications made, 39 were approved. The result was the potential creation of 31 new lots within the ALR, as 5 approvals were for boundary adjustment and 3 approvals were on the condition of parcel consolidation. Not all approved subdivisions were implemented, so the net increase in parcels between 1990 and 2006 was less than 31. If all 84 applications had been approved as proposed, 121 new lots could have been created within the ALR.



One quarter of all the proposed new lots were approved.

4. Proposals and Approvals - Consistency with Zoning Bylaws

The proposals for subdivision reviewed for this study typically did not adhere to the prescribed minimum lot sizes. Of the applications, 75% proposed at least one new parcel that would be smaller than the specified minimum lot size. Of all applications received, 24% were made under the homesite severance policy and most proposed homesites were for parcels of one hectare or less, a size that is inconsistent with the CSRD's Rural ALR zoning.

Figure 3: Zoning Designations on Parcels with Subdivision Applications

Zoning		Minimum Lot Size
RU-ALR.....	Rural ALR	8 ha
RU-1	Rural One	8 ha
CR-4	Country Residential Four	8 ha
UR-40	Upland Resource	40 ha
RM.....	Residential Multiple	0.4 ha (4000 m ²)
PA-1	Public Assembly	0.0325 ha (325 m ²)

Of the 39 approved proposals, 79% were not consistent with Comox-Strathcona Regional District's zoning. Approvals under the homesite severance policy account for 38% of the total approved proposals. Of all approved applications, 41% do not conform to the minimum lot size and are not homesite severances.



The minimum lot size set out in the zoning bylaw did not appear to have a significant influence on the decision-making process.

5. Applications Approved and Refused

Figures 4 and 5 show the annual number and percent of subdivision applications approved and refused by the ALC. The distribution of applications by decision can be seen in Map 1.

Figure 4: Applications Received by Year and Decision

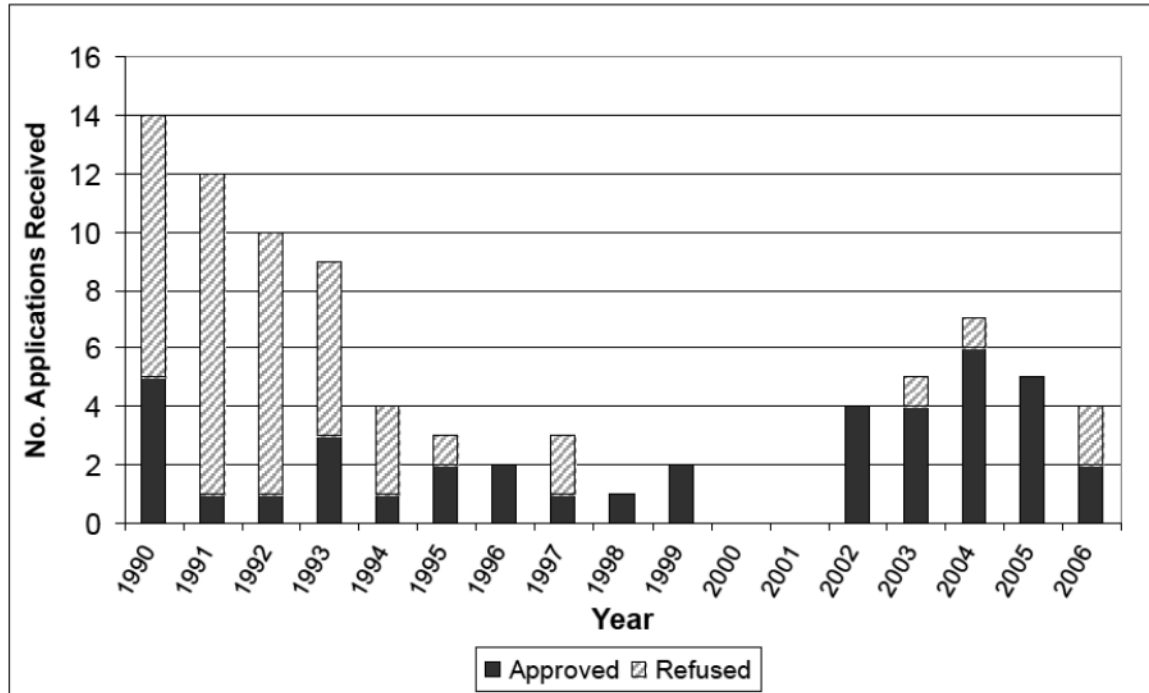
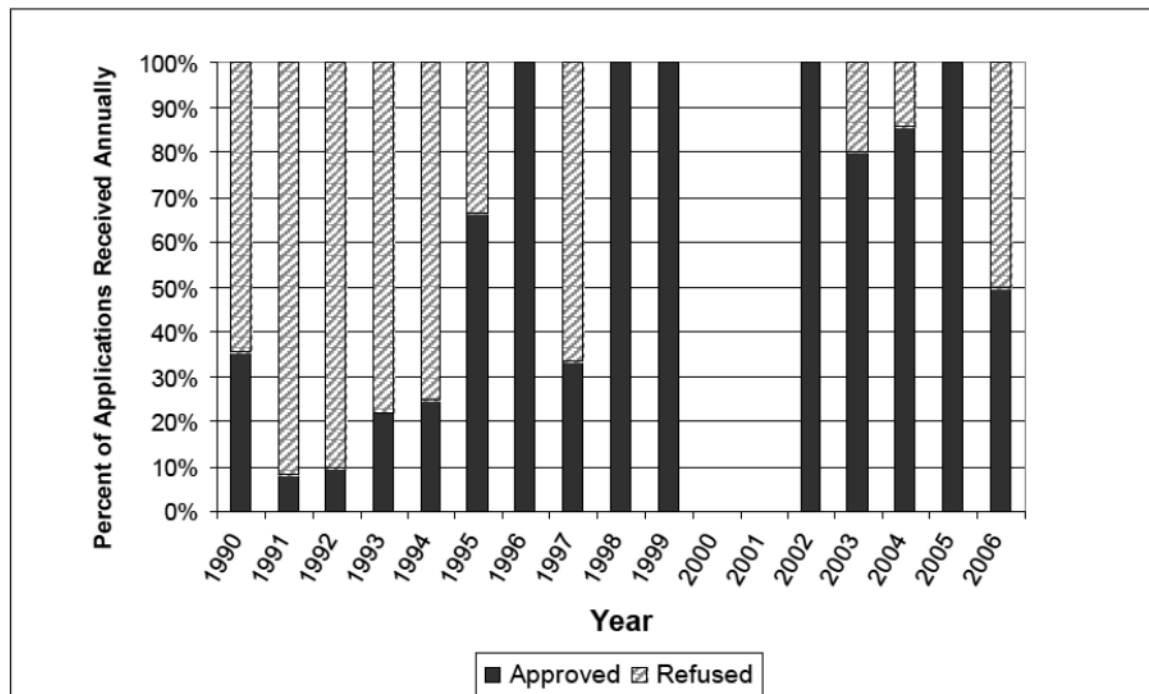
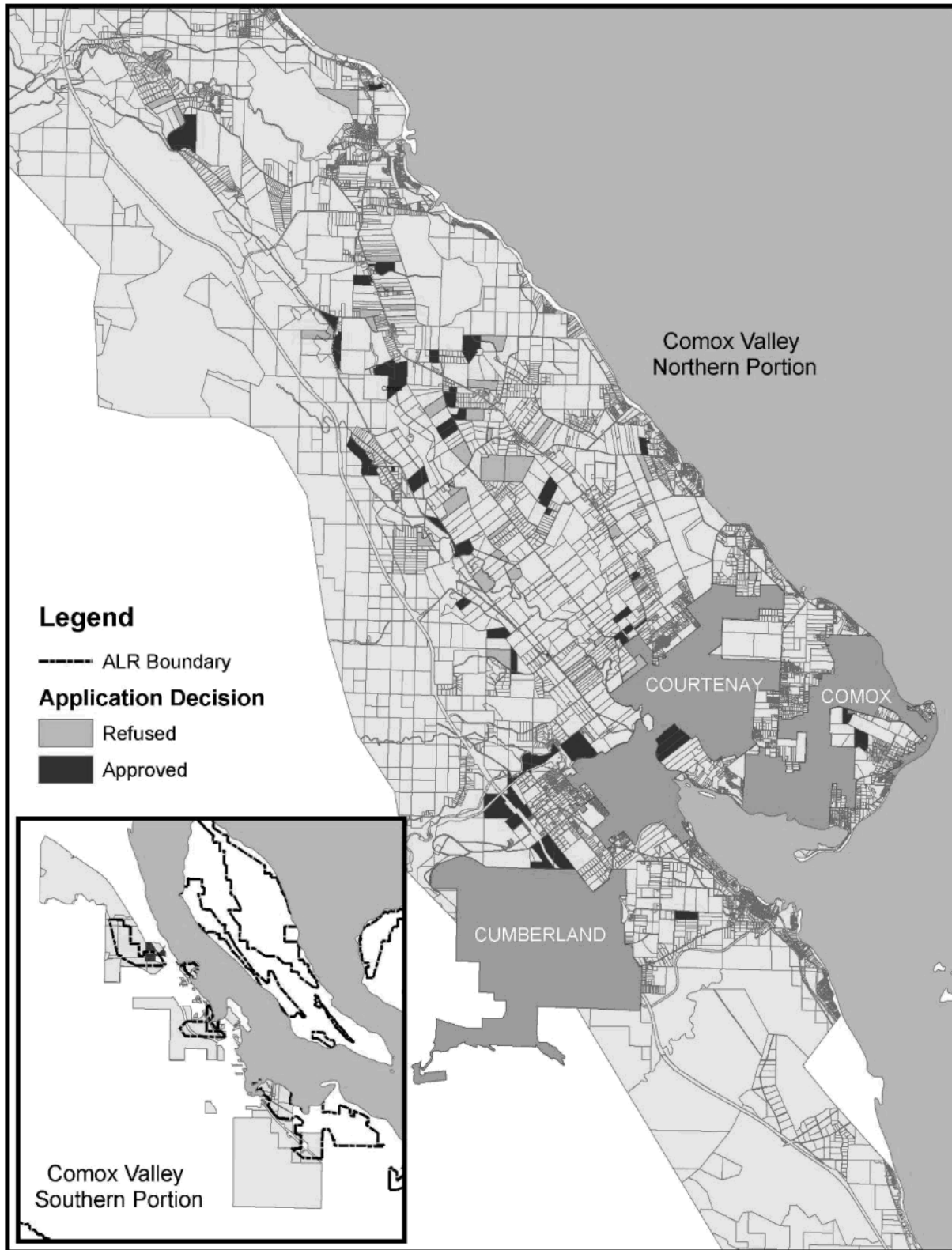


Figure 5: ALC Decision as a Percent of Total Annual Applications



Map 1: Location of properties with subdivision applications in the study area.



6. Types of Approval Decisions

Decisions for approving subdivision can be one of four types (Figure 6). This figure indicates the frequency of each decision on applications received between 1990 and 2006. Figure 7 summarises each decision as a percentage of total annual applications.

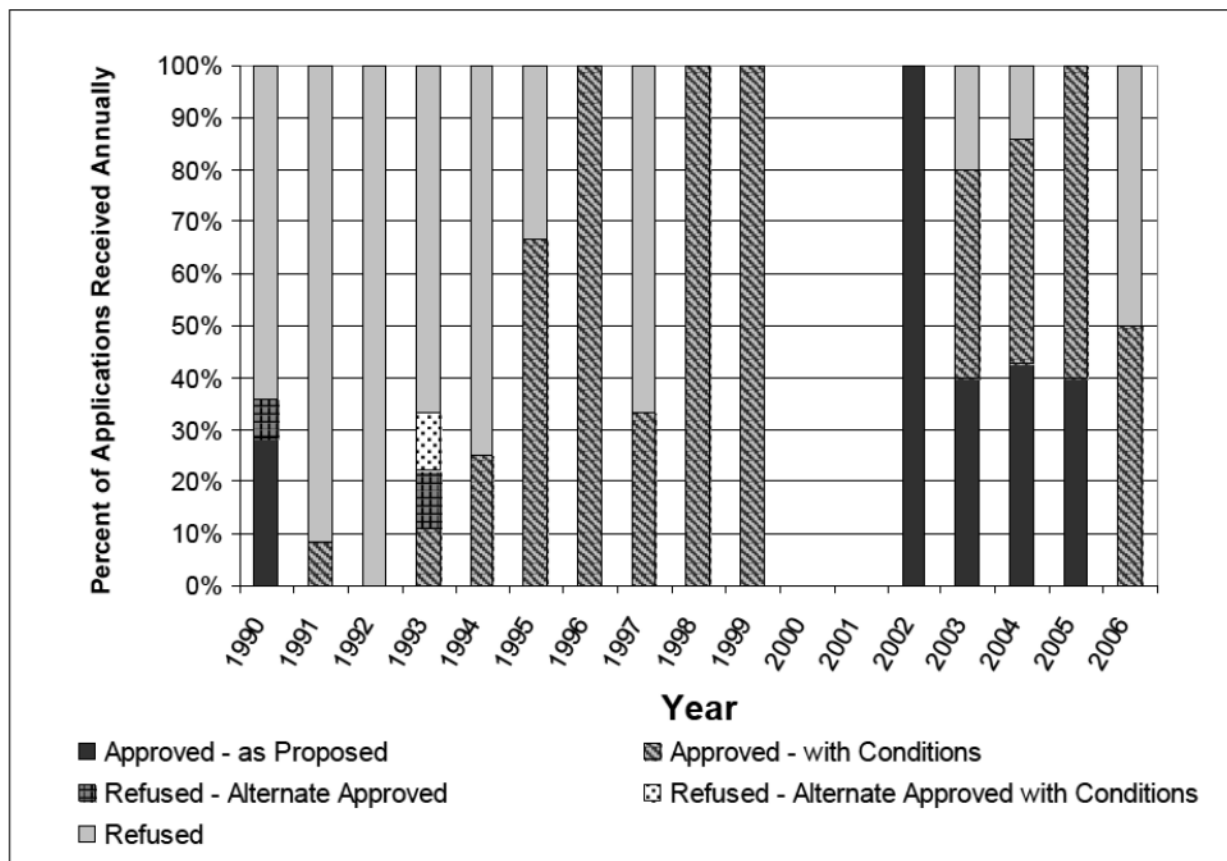


The majority of applications were refused. Of all approved applications, 56% were approved with conditions.

Figure 6: ALC Decision Categories

1990-2006 Decision	Total
Refused	45
Approved as Proposed	15
Approved with Conditions	21
Refused as Submitted; Approved Alternate Proposal	2
Refused as Submitted; Approved Alternate Proposal with Conditions	1

Figure 7: ALC Decision by Year and Type (as a percent of applications received annually)



7. Conditions for Approval

A variety of conditions were noted on approved applications. The condition of “proof of intent to develop lot for farm purposes” was cited only once. As subdivision in the ALR should seek to protect or enhance agriculture, requiring proof of intent to subdivide the lot for farm purposes would be a useful policy tool in considering future applications⁵. A list of all conditions applied to approvals can be found in Appendix B.

8. Lot Size of Approved Parcels

Only approved parcels were considered for this analysis. Of 36 applications, two involved the creation of 2 parcels, so a total of 38 parcels were analyzed.

Table 2 summarises parcels approved for subdivision by size range. The parcels shown are approvals in decision only, as they have not necessarily been implemented.

The number of parcels in the 2 to 4 hectare size range increased following approval. This is attributed to the 15 homesite severance applications that were approved.

As might be expected, the largest parcels decreased as a percentage of the total (Figure 8). Approvals on the larger parcels will typically leave the parent parcel within the larger size class and create a new parcel in a smaller size class.

Parcels less than 8 hectares are being approved in the ALR. This impacts agriculture by limiting the land base available for operations requiring large lots, and affects the affordability of developing new farms. For further discussion of this topic, please see *Part E: Lot Size, Property Value, and Agricultural Activity*.

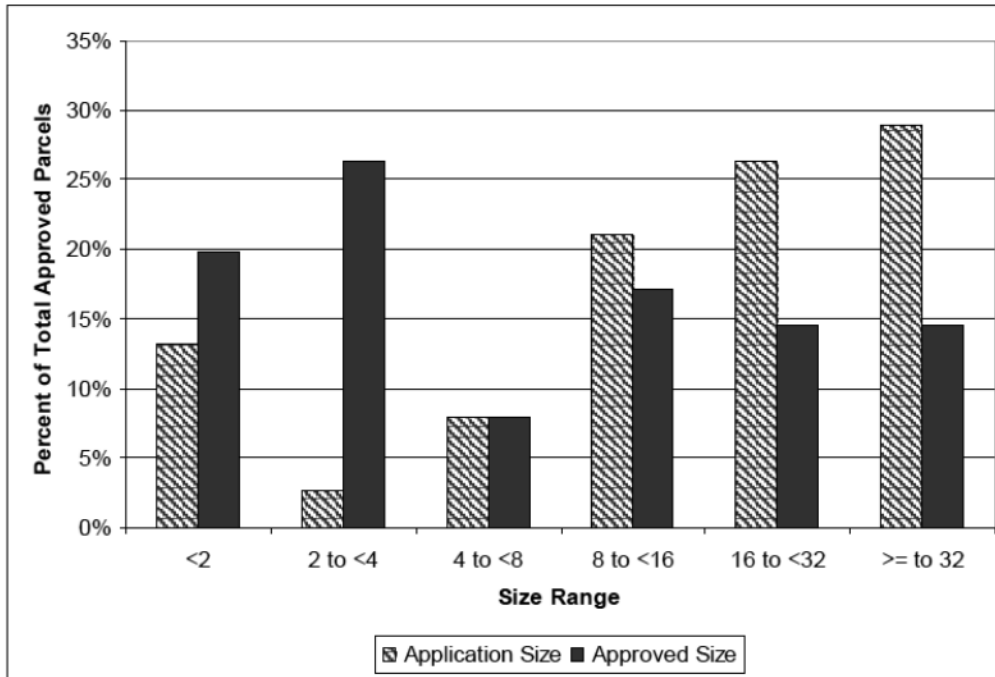
Table 2: Parcels Approved as Proposed or Approved with Conditions - 1990 to 2006

Size Range (Ha)	At Time of Application		After Approval	
	# of Parcels	% of Total	# of Parcels	% of Total
<2	5	13%	15	20%
2 to <4	1	3%	20	26%
4 to <8	3	8%	6	8%
8 to <16	8	21%	13	17%
16 to <32	10	26%	11	14%
32+	11	29%	11	14%

⁵ Conditions applied at the time of subdivision approval should be used to encourage the development of agriculture on subdivided lots:

- Post bond at the time of approval until a farm is developed
- Require proof of intent (i.e. farm plan) to develop the lot for farm purposes
- Restrict the development of an additional house until a farm is established
- Place a covenant on the new lot requiring it to be used for farming purposes

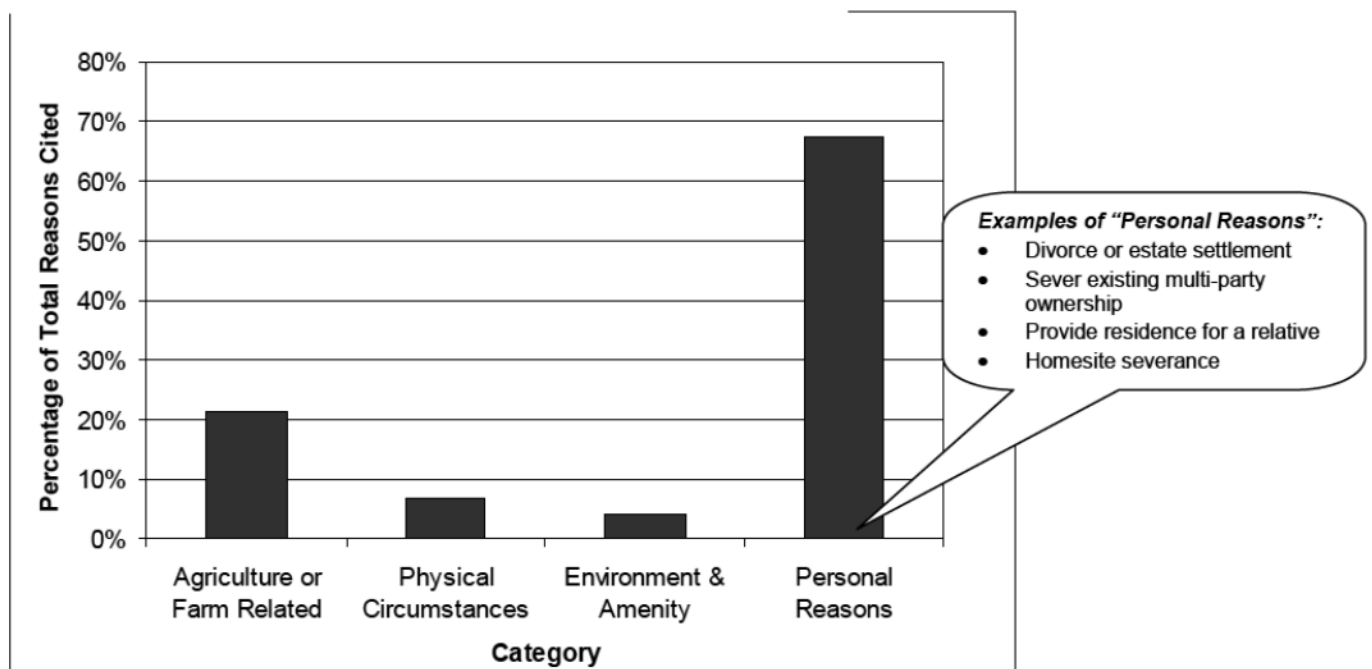
Figure 8: Parcel Size at Time of Application compared to Approved Parcel Size (1990-2006)



Motivation for Subdivision and Resulting Decisions

Applicant motivations for proposing subdivision are noted at the time of application. Reasons are summarised into four broad categories: Agriculture/ Farm Related, Physical Circumstances, Environment & Amenity, and Personal Reasons (Figure 9). The majority of reasons cited are personal rather than agricultural. Table 3 summarises the top five motivations for subdivision cited by applicants. Appendix C contains a full list of these reasons.

Figure 9: Applicant Motivation for Subdivision



None of the top five reasons were to promote or enhance agriculture. Overall, six applicants cited their reason for application as “to expand or intensify the existing farm use”, and 2 cited that subdivision was “to provide financing for agricultural improvements.”

More than 2/3 of applications made for personal reasons were refused. Of the personal reasons given on approved applications, 6 were for homesite severance.

Two-thirds of applications motivated by agricultural reasons were approved for subdivision. Four of these were not seeking to improve or enhance agriculture, but to reduce holdings of poor or lesser agricultural potential.

Table 3: Applicant Motivation for Subdivision - Top Reasons		
Applicant Reason	No. Times Cited	% of Total Citations
Residence for a relative	26	22%
Reduce holdings by future sale	14	12%
Homesite severance	14	12%
Sever existing multi-party ownership	9	8%
Land has poor agricultural potential	8	7%

Table 4: Motivation and Decision Result		
	Approved	Refused
Personal Reasons	15	37
Agricultural Reasons	16	8
Physical Circumstances	5	0
Environment and Amenity	3	0
Total Applications	39	45

Part C: Lot Size and Land Use

1. Change in Parcel Size: 1997-2007

This section examines changes in mean lot size in the Comox Valley between 1997 and 2007. BC Assessment records of ALR parcel sizes from 1997 and 2007 were used for this analysis⁶. Only the Courtenay Rural ALR parcels were analysed. In 2005 and 2006 several large upland forest parcels were excluded from the ALR in this area; these parcels were not included in the analysis.

Table 5 shows the number of parcels by size category in the Courtney Rural ALR and the average parcel size for these two years. The average parcel size has decreased by 1.6 hectares over this 10-year period.

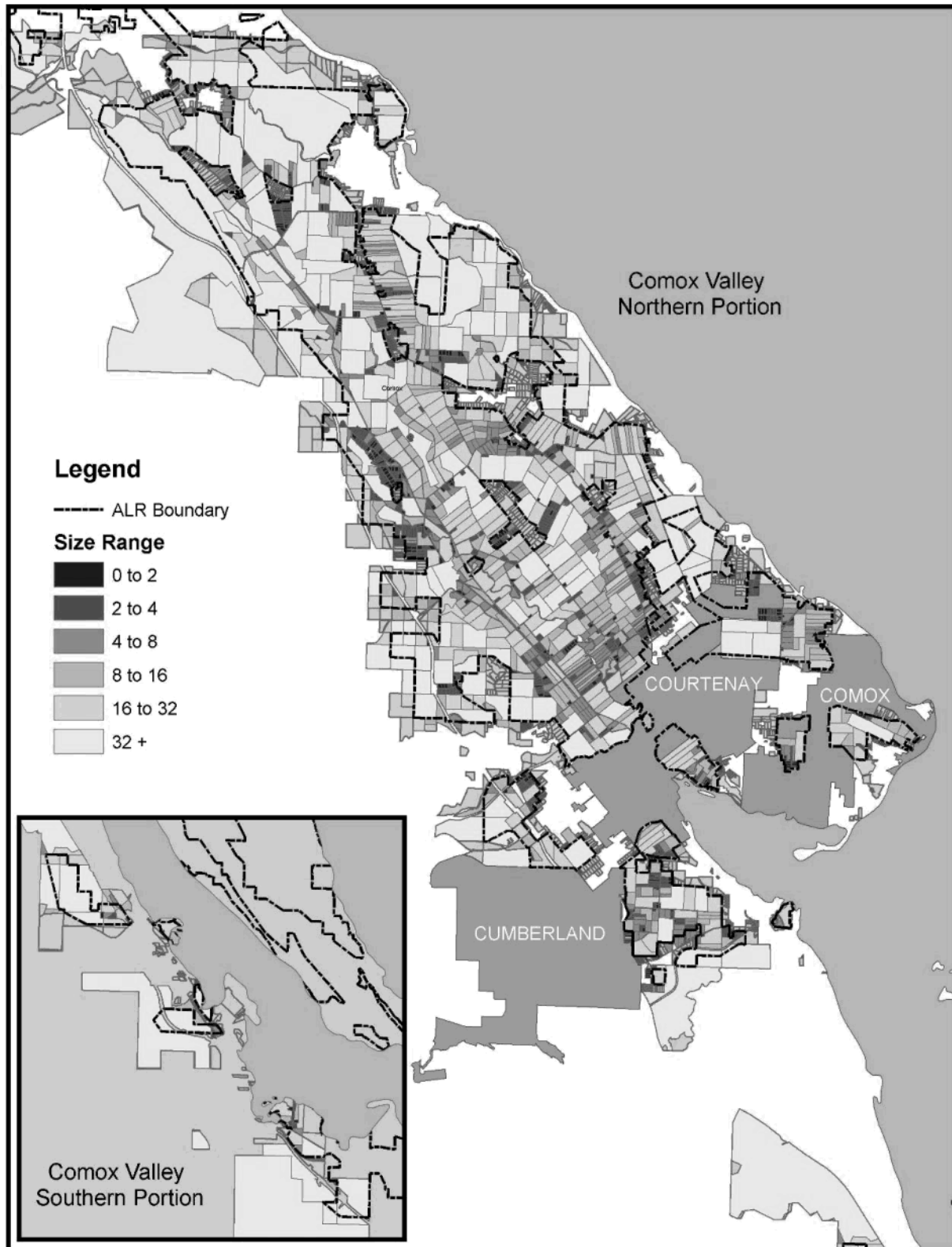
The number of parcels in the smaller size categories increased, while the number of large parcels (greater than 16 hectares) decreased. These changes may be attributed in part to subdivision, but may also be affected by exclusions, parcel consolidations and ALR boundary adjustments. BC Assessment tracks mobile homes as separate parcels for taxation purposes, which may account for the increase in the number of smaller parcels and may not be associated with an increase in subdivision applications.

The current distribution of parcels by size range in the Comox Valley ALR is illustrated in Map 2 on the following page.

Table 5: Parcel Count by Size Range Courtenay Rural ALR (1997-2007)				
	1997	2007	Change	
Parcel Size (ha)	Number of Parcels	Number of Parcels	No.	%
<2	315	338	+ 23	7%
2 to <4	349	363	+ 14	4%
4 to <8	285	289	+ 4	1%
8 to <16	234	243	+ 9	4%
>16	426	384	- 42	-10%
Total	1609	1617	+ 8	
Average parcel size (ha)	14.5	12.9	- 1.6	-11%

⁶ The analysis includes all ALR parcels in the Courtenay Rural jurisdiction.⁶

Map 2: Parcel size ranges within the study area (2007).



2. Change in Agricultural Land Use on all Parcels: 1990-2007

This section examines the relationship between agricultural land uses and subdivision during the period from 1990 to 2007. Changes in land use were determined based on information originally supplied on the subdivision application⁷ and, information acquired through a land use inventory undertaken in 2007. Table 6 compares the changes in agricultural land use on properties that were refused subdivision versus those that were approved.

Table 6: Change in Agricultural Land Use (1990-2007)		
	Decision	
	Refused	Approved
Total number of parcels	39	65
Parcels with agriculture at time of application	16	35
→ Parcels that lost agriculture since application	-1	-16
→ Parcels that gained new agriculture since application	+12	+6
Parcels with agriculture in 2007	27	25
Percent change in agricultural use since application	+69%	-29%

Of the 39 parcels where subdivision was refused, only one lost an agricultural use that was present at the time of application. By 2007, 12 of these parcels had gained new agricultural use. On the 65 parcels approved for subdivision there was a 29% net loss of agriculture.

Key Agriculture is more enduring on parcels where subdivision has been refused; these parcels are more likely to retain their original agricultural uses and gain new ones than those parcels approved for subdivision.

Table 7 summarises subdivided parcels that had agricultural land use at the time of application based on size range. Most of the parcels that retained their agricultural land use are 8 hectares or larger in size while most parcels that lost an agricultural land use are less than 8 hectares

Key Agricultural land uses appear to be more readily retained on larger parcels.

Table 7: Parcels with Agriculture at Time of Application Compared to 2007 (Subdivisions Approved and Implemented)				
2007 Parcel Size	Kept Agriculture		Lost Agriculture	
	No.	%	No.	%
0 to < 8 ha	3	25%	10	71%
8+ ha	9	75%	4	29%
Total	12	100%	14	100%

⁷ As part of the decision-making process for subdivision applications, the ALC collects relevant information about each property including land use at the time of application.

3. Change in General Land Use on Subdivided Parcels: 2002-2007

Land use data collected by MAL for 2002 and 2007 was compared in order to assess land use changes on subdivided parcels⁸. Table 8 summarises changes in land use on parcels that were subdivided between 2002 and 2007. Parcels shaded grey show a change in land cover. Due to limited data available on land use, the sample size is small which makes it difficult to draw conclusions. **However, this methodology could be readily applied in other areas where land use inventories are available for consecutive years; this approach would be invaluable in helping to improve the understanding of the impacts of subdivision on agricultural activity levels.**

Table 8: Change in General Land Use on Subdivided Parcels (2002-2007)				
	2002 Land Use (7 parcels)	2007 Land Use (15 Parcels)		
	Parent Parcels	Subdivided Parcels		
		Parcel 1	Parcel 2	Parcel 3
Approval 1 Size (ha)	Agriculture 52.4	Agriculture 50.3	Residential 2.1	n/a
Approval 2 Size (ha)	Agriculture 25.5	Agriculture 17	Residential 8.5	n/a
Approval 3 Size (ha)	Forestry 47.6	Forestry 38.5	Not in Use 9.1	n/a
Approval 4 Size (ha)	Hobby Farm 4.1	Hobby Farm 2.03	Residential 2.07	n/a
Approval 5 Size (ha)	Land in Transition 8.6	Agriculture 1.7	Not in Use 3.7	Not in Use 3.2
Approval 6 Size (ha)	Not in Use 13.5	Not in Use 11.67	Agriculture 2.41	n/a
Approval 7 Size (ha)	Residential 10.8	Residential 8.8	Residential 2.0	n/a

The 7 parcels approved during this time were subdivided into 15 different parcels by 2007. Subdivision only resulted in two parcels being brought into agriculture use. Four of the newly subdivided parcels are primarily residential in use (Table 8).

On subdivided parcels, the total number of hectares in agricultural use went from 82 hectares in 2002 to 73.4 hectares in 2007, resulting in a 10.5% decrease in the amount of land in production.

⁸ Refer to *Ag Focus: A Guide to the Land Use Inventory* for more details on the survey methodology used.

Part D: Lot Size, Property Value, and Agricultural Activity

Although the overall price for a small parcel is less than a large parcel, which can be advantageous to new or established farmers who do not need a lot of land for their product, on a price per hectare basis, small parcels are significantly more expensive. It is generally accepted that smaller parcels garner a higher price per hectare than larger parcels. This may be a factor in limiting future agricultural use on smaller, subdivided parcels. This pilot study briefly examined sales values for properties in the Comox Valley ALR that received subdivision applications and were sold between 1990 and 2007.

Table 9 indicates the average per hectare sale value per hectare for properties by size.⁹ Sales values were adjusted to 2007 dollars using an inflation calculator from the Bank of Canada.¹⁰

The average per hectare sales value of properties less than 4 hectares is almost 8 times that of properties larger than 16 hectares. This may be a result of smaller parcels having a larger residential footprint or other improvements relative to the total size of the parcel. It may also be related to the high demand for rural residential properties. It is worth considering that while larger parcels may have a lower price per hectare, the overall cost of the larger parcels is higher, which may affect their affordability for both new and established farmers.

In addition to looking at the relationship between parcel size and property value, the study briefly examined the type of agricultural activity taking place on small (less than 8 hectares) and large (8 hectares or more) parcels. Forage operations are the predominant agricultural activity found in both size classes. Hobby scale livestock and horse operations are more prevalent on parcels less than 8 hectares. There were more field vegetables, dairy, berry and tree farms on the larger parcels. Intensive type operations such as poultry and nursery seemed to be equally distributed amongst lot sizes and did not predominate on smaller lots.

Table 9: Average Sale Value per Hectare

Size Class	Average Sale Price per Hectare	Number of Records
2 to <4	\$ 84,802	26
4 to <8	\$ 45,160	22
8 to <16	\$ 31,437	24
>=16	\$ 10,861	42

⁹ Sales by year and value were obtained for all parcels in the study area. "Reject" records indicated a sale below market value or unsuitable for sales analysis were excluded. Over these 5 years, a total of 41 sales suitable for analysis took place on subdivided parcels. Information on parcel size at the time of sale was available for 25 of the 41 parcels. Except for 2002 sales, parcel sizes for individual sales were obtained from BC Assessment databases. Parcel sizes for sales in 2002 were obtained using GIS and the roll numbers were cross referenced with parcel size information in the 2002 cadastre.

¹⁰ The Inflation Calculator uses the Consumer Price Index to adjust values to reflect annual inflation rates. The CPI is calculated by tracking the retail prices of a variety of consumer goods from an average household's expenditure; these include food, housing, transportation, furniture, clothing, and recreation. Prices are then measured against a base year (in this case, 2007) and adjusted accordingly.

Part E: Inter-Agency Decisions on Subdivision Applications

While the ALC makes the final decision with regard to approving or refusing subdivision in the ALR, the following agencies provide recommendations to the ALC on the subdivision applications: Regional District Board, Community Planning Services, and CSRD Agricultural Advisory Committee. A comparison between the recommendations of different agencies and the decisions of the ALC was undertaken to determine the level of agreement between all agencies with regards to subdivision applications and approvals.

1. Support for Subdivision Applications by Agency

While the ALC may approve or refuse applications, the other agencies will forward individual recommendations of “no comment”, “recommend refusal”, “no objection”, or “support” for each subdivision application.¹¹

Table 10 includes only applications where an agency indicated “support” for the proposal and/or the ALC approved the proposal.¹² The ALC’s support for subdivision (as a percentage) is highest at 46% and the AAC’s support is lowest at 19%.

Table 10: Percentage of Subdivision Applications Approved by Agency 1990-2006		
	No. Subdivision Applications Reviewed	Percentage of Subdivision Applications Supported
Agricultural Land Commission	84	46%
Regional District of Comox-Strathcona	79	30%
Community Planning Services	82	20%
CSRD Agricultural Advisory Committee	68	19%

¹¹ The CSRD Agricultural Advisory Committee was established in 1996; the number of subdivision applications reviewed has been adjusted to reflect this.


¹² The CSRD Community Planning Services reviewed support for subdivision applications by agency between 2000 and 2005. These results can be found in Appendix D – findings are similar as noted in section 2 here.


2. Inter-Agency Decisions on Applications

Table 14 compares recommendations on jointly reviewed applications.

Agreement was reached on 46% of the 61 applications reviewed by all four agencies. This may be due to differing perspectives and mandates of each agency.

Table 11: Agreement on Applications Reviewed		
Agency	No. of Applications Reviewed	Agreement on Recommendations (%)
Regional District & Community Planning Services	70	77%
Regional District & Agricultural Land Commission	76	81%
Community Planning Services & Agricultural Land Commission	77	81%
Community Planning Services & CSRD Agricultural Advisory Committee	68	74%
Regional District & CSRD Agricultural Advisory Committee	65	66%
Agricultural Land Commission & CSRD Agricultural Advisory Committee	68	63%
All Agencies	61	46%

 The highest level of agreement (81%) occurred between the ALC and the CSRD, and the lowest level of agreement (63%) occurred between the ALC and the CSRD AAC.

 Further investigation should be undertaken to understand how decision criteria differ by agency.

3. Reasons for Agency Recommendations

When making recommendations about subdivision applications, each agency generally provides a rationale to support their recommendation. To understand the similarities and differences between these recommendations, the reasons were categorized and summarized. Each agency may provide more than one reason for their recommendation on an application; the top 3 reasons for refusal and approval were summarized. Appendix D has a complete list of cited reasons. *Note: Regional Agrologist comments were not analysed as recommendations were not made in every case.*

Reasons for Recommending Refusal by Agency

The supporting rationale for agency recommendations provides some insight into the decision making process. For example, Community Planning Services and the Regional District Board both considered the consistency of the subdivision proposal with the existing regulatory framework, while the ALC and Agricultural Advisory Committee did not. Agricultural potential was a key reason for refusing subdivision by all agencies except the Regional District Board.

Reasons for Recommending Approval/Support

A common reason for agency support for subdivision is that the applicant is eligible under the homesite severance policy (HSP). Another common reason for supporting subdivision is when the subject property is deemed to have poor agricultural suitability in terms of either lot configuration or soil capability. It should be kept in mind that many agricultural activities do not rely on soil capability (e.g. poultry production, greenhouses, mushroom farms). Although the Comox Valley's agricultural sector is almost exclusively soil-based, this is not the case in other areas of BC, particularly in the Lower Mainland. **In these locations, agricultural suitability should not be a factor in considering cases of subdivision.**



Reasons for Recommending No Objection¹³

In some instances where the proposal is seen to have no negative impact on agriculture, this is given as a reason for providing no objection to the proposal. However, given the policy context of the Comox Valley Agricultural Plan (2002) and Official Community Plan (1998) which seek to protect and enhance agricultural land, particularly with regard to the retention of large agricultural parcels, it may be more appropriate to demonstrate that the proposal would protect or enhance agriculture rather than simply have no negative impact.



Given the existing policies that support the protection of agricultural lands and the retention of large parcels, agencies should make clear recommendation of either support or refusal. It may be more appropriate to demonstrate that proposals will protect or enhance agriculture rather than simply have no negative impact.

¹³ Each agency may state "no objection" to the proposal rather than direct support or refusal. The ALC is not considered in this section because their role enables them only to refuse or approve applications.

Part F: Recommendations

1. Improve the tracking of subdivision applications

- ☒ Applications for subdivision and non-farm use applications have the same application code making it difficult to track subdivision. **To address this, each type of application should be recorded using a distinct code.**

Information supplied in the Application Tracking System (ATS) database is inconsistent. There are gaps in certain time periods and applications. This study examined applications received between 1990 and 2006; in several circumstances, the proposal description, decision date, or other information was missing from the ATS database record.

- ☒ **A consistent record of proposals and decisions in the database would aid in more effective and efficient future studies.**

Other than the legal description (e.g. Lot A, Block 29, District Lot 46, Plan 4000) no consistent parcel identifier is provided in the file for each application. This study used the available address, parcel identifier, and hard copy map information to identify each parcel with an application in the 2007 CSRD cadastre.

- ☒ **By consistently recording (in the ALC file) the Jurisdiction Roll Number assigned to properties by BC Assessment, the parent parcels and new parcels created through subdivision would be easier to identify for study purposes.**

The minutes found in the hard copy of the ALC files record the decision made on each application but do not record when approved subdivisions are implemented. For this study, a hard copy map of each proposal was compared to the 2007 cadastre to determine if approved subdivisions were implemented. **A consistent record of subdivision implementation, parent parcel identifiers, and new parcel identifiers would greatly enhance the ability to study subdivision and land use.**

- ☒

This study only examined subdivision within the Comox Valley rather than the entire CSRD.

- ☒ **Future studies should investigate parcel size and agricultural land use within a complete jurisdiction (e.g. regional district, municipality, electoral area) to simplify analysis and provide a complete picture of land use and lot size in the region.**

2. Develop a coordinated system to record land use

Both the land use inventory used by MAL and the ALC files record land use information for properties in the Agricultural Land Reserve. In the case of the ALC, land use is only investigated if an application is made on a property. In the interest of examining the relationship between land use and lot size, the land use at the time of application for subdivision can be valuable information. At present the ALC and the land use inventory are not coordinated and do not have consistent categories for recording land use. **A coordinated system of recording specific land uses and cover types at the time of application could be of benefit in terms of future study and decision making processes.**

- ☒

3. Develop decision-making criteria for subdivision applications

A number of agencies provide the ALC with recommendations on subdivision applications. When recommendations were analyzed as part of this study, there was limited agreement between agencies on recommendations involving subdivision.

A variety of reasons were cited by the various agencies in their recommendations for each application. In several cases, “no comment” was the only response given. Furthermore, it was difficult to ascertain to what degree each agency applies criteria in their recommendation process.

☒ If all agencies developed and used a consistent list of criteria, this could facilitate more consistent decision making by all parties and ensure increased transparency in the decision-making process.

4. Investigate consistency of local government policies and decisions

Local governments are the initial recipients of applications for subdivision on ALR lands. While they do not have the authority to approve subdivision in the ALR, they can refuse the application based on their current planning policy and zoning context. If a local government does not want to make a decision (i.e. refusal) on an application, they can forward it to the ALC.

The MAL Regional Agrologist indicated that since 2006 the Comox-Strathcona Regional District has been reviewing applications and applying their policies before forwarding subdivision applications to the ALC. As other local governments around BC have agricultural plans with similar policies, this is a practice that should be encouraged. Local government review and vetting of ALR applications as to their consistency with the local policy context not only streamlines the ALC’s review process, it further encourages local governments to take an active role in protecting and promoting agriculture.

☒ Further study is needed to understand to what degree local governments are reviewing subdivision applications, the criteria they are using in the decision-making process, and how successful they are at achieving the goals and objectives outlined in their plans with respect to subdivision in the ALR.

5. Encourage agriculture on existing small lots

Small lots provide opportunity for a variety of intensive agricultural uses and are also conducive to direct farm marketing. However, they are not conducive to more extensive types of agriculture and tend to attract more urban-oriented buyers, which drives up the price of small lots. This can create a financial barrier for farmers who may be interested in starting (or expanding) agricultural operations on land that is made available through subdivision and sale.

Local governments can undertake a number of steps to promote agriculture on existing small lots and discourage non-farm uses from dominating these lots types. Below is information drawn from existing local government small lot policies: the Regional District of Central Okanagan (RDCO) Agricultural Plan, the District of Summerland draft Agricultural Plan, and the District of North Cowichan Agricultural Plan.

Reduce Speculation for Urban Uses

Some policies focus on reducing the type of speculation that encourages country estates. For example, recommendations from the RDCO Agriculture Plan (2005) suggest that local governments can work with the Real Estate Board to cultivate a better understanding of the importance of the ALR for food production. This Plan also suggests that land use policies can help reduce residential speculation by clearly promoting agricultural uses rather than implying potential for urban development in the ALR.

Reduce the Residential Footprint

Both the RDCO and the Summerland Agricultural Plans encourage using regulation to reduce the size of residences and implement setbacks. This is intended to reduce the fragmentation of agricultural parcels by confining non-farm uses to the edge of the property, eliminating the need for new road or driveway access, and providing suitable siting for homesite severances that leave the agricultural land intact. Limiting the size of the residential developments also serves to ensure the property remains affordable for potential farmers. In instances where a homeowner wishes to vary their building size, an agricultural impact assessment is recommended to enable local governments to determine how this might impact the agricultural potential of the property.

Encourage Parcel Amalgamation and Leasing

The draft Summerland Agricultural Plan (2005) recommends consolidating smaller parcels into larger ones where possible to give farmers greater access to economy of scale and reduced exposure to financial risk. It is suggested that local governments review and streamline their parcel amalgamation procedures in order to encourage this practice. In Summerland many of the small parcels are not farmed by the resident, but are leased out for agricultural purposes. The Summerland and North Cowichan Agricultural Plans suggest that local governments encourage small lot farming by providing a registry of farmland available for lease. Through leases farmers unable to make the investment required for purchase may still be able to access agricultural land.

Develop Support Programs

The RDCO Agricultural Plan suggests the development of support programs at the local government level to re-establish agriculture in areas which have become inactive. The Orchard Replant Program is a local program where the local government provides financial assistance to enhance the viability of new orchard operations on ALR land no longer in use. While this recommendation is not specifically targeted to small lot agriculture, it could be adapted to suit this purpose. The North Cowichan Agricultural Plan (2001) recommends that local government play a role in identifying commodities suitable to small lots in that area. Also recommended is the development of extension/training programs for existing and prospective small lot farmers to train them in such things as business management and direct marketing on small lots.

Change Zoning Bylaws to Support more Diverse Agricultural Activity

The North Cowichan Agricultural Plan recommends review and changes to the zoning bylaw to encourage agriculture on small lots. It suggests that zoning applied to ALR and non-ALR agricultural land be modified to support production of a more diverse product base, allow for a wider variety of processing and direct marketing facilities, and create opportunities for combined or cooperative farm product processing and sales. It also suggests allowing a greater diversity of small non-farm uses to support the household income of small farmers with limited land base.

Part G: Conclusions

This study was undertaken as a joint venture between the Ministry of Agriculture and Lands and the Agricultural Land Commission in the summer of 2007. It examined the regulatory context, land use, parcel size, sales value, and recommendations made by different agencies with regard to subdivision applications in the Comox Valley ALR.

A number of key findings arose from the study:

- Local government policy on subdivision and minimum lot size set out in the zoning bylaw did not appear to have a significant influence on the decision-making process when it came to approving / denying subdivision.
- The majority of subdivision applications were refused.
- Applicant motivation for subdivision rarely had to do with a desire to improve agricultural capability.
- Average parcel size decreased by 35% over the 10 years studied.
- Parcels refused subdivision are more likely to retain or gain an agricultural use than parcels approved for subdivision.
- Interagency agreement on whether to approve subdivision was 46%.

Some of the recommendations that emerged from the study include:

- The ALC Application Tracking System should include the property's Jurisdiction Roll Number on subdivision applications.
- Agencies should develop and apply consistent decision criteria to enhance transparency in decision-making and improve inter-agency agreement on subdivision decisions.
- All agencies should refer to existing local government policies regarding agriculture and parcel size as a supportive framework for considering requests for subdivision in the ALR.
- Local governments should undertake a number of steps to promote agriculture on existing small lots.

Recommendations about how to approach future studies on land use and lot size in the ALR are also included. While this is a small sample size, the methodology employed has proven to be a useful means of improving understanding of how land use might be affected by lot size. This approach could be applied to other areas where there are more subdivision applications and the land use inventory information is available over a longer period of time. A broader study would provide a bigger snapshot of the relationship between lot size and agricultural activity and ultimately aid in future decision-making processes related to subdivision of land in the ALR.

Appendix A: Average Parcel Size by Zoning Designation

Parcels Completely Within ALR			
Zoning Designation	Min. Lot Size (Ha)	Parcel Count	Average Area (Ha)
CA	0.4047	1	0.83
IL	1	5	0.98
PA-1	0.0325	9	1.37
RR-1	20	1	37.58
RU-1	8	19	17.61
RU-8	8	3	2.74
RU-ALR	8	1275	10.79
UR-400ha	400	1	43.73
UR-40ha	40	35	19.93

Parcels Partially Within ALR			
Zoning Designation	Min. Lot Size (Ha)	Parcel Count	Average Area (Ha)
C-1	0.2023	11	0.53
C-2	1	1	0.87
CR-1	2	89	2.09
CR-4	2	12	1.53
CR-5	8	1	0.46
IH	2	3	5.30
IL	1	13	3.34
PA-1	0.0325	3	3.22
R-1	1	1	0.16
RM	0.4047	1	0.20
R-RU	0.8	127	1.30
RU-1	8	12	81.29
RU-20	20	40	46.09
RU-8	8	184	5.05
RU-ALR	8	47	41.73
TC-2	0.4047	1	3.94
TU-1	2	1	0.01
UR-400ha	400	22	176.09
UR-40ha	40	44	59.53

Appendix B: Categories of Conditional Approvals

<i>Condition</i>	<i>No. Times Cited</i>
Standard Homesite Severance terms and conditions.....	9
Inclusion of new land into the ALR.....	3
Livestock fencing of the newly subdivided parcel	3
Size of parcel conditional on Ministry of Health approved size for septic disposal.....	3
Consolidation of some or all of an adjacent property with the subject property	3
Approval in lieu of any future consideration under the homesite severance policy	2
Park acquisition of some of the subject property by Local Government.....	1
That a covenant be registered	1
No road access to be granted to the subdivided parcels.....	1
Removal of a second or otherwise non-compliant dwelling.....	1
Bond to ensure proposed improvements are made.....	1
Construction of safe vehicle access to the parcel.....	1
Setbacks specified by the ALC	1
Proof of intent to develop lot for farm purposes.....	1
Time constraint on subdivision completion 3 years from approval date	1

Appendix C: Applicant Motivation for Subdivision Proposals

a) Agriculture or Farm Related

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
PP	Land has poor agricultural potential	8
EEU	Expand or intensify existing farm use	6
SAF	Sale to agent for farm use	4
FF	Future farm use.....	4
FAI	Financing for agricultural improvements.....	2
SF	Separate two existing farm operations	1

b) Physical Circumstances

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
B	Subdivision along the ALR boundary	2
RA	Reduce alienated or restricted access portions of the subject property.....	2
ROW	Subdivision along road dedication or right-of-way.....	2
TS	Title for lands severed by highway development.....	2

c) Environment & Amenity

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
EH	Creation of an area for environmental habitat, ESA or EHMA	3
P	Park dedication	2

d) Personal Reasons

<i>Code</i>	<i>Cited Reason</i>	<i>No. Times Cited</i>
RR	Residence for a relative	26
HS	homesite severance.....	14
RH	Reduce holdings by future sale	14
SO	Sever existing multi-party ownership.....	9
E	Estate settlement	3
RD	New residential development in the ALR, not for applicant or relative	3
RU	Residential use, not for applicant or relative.....	3
SPC	Separate personal and corporate finances.....	2
DS	Divorce settlement	2
REU	Relocate existing use on property or to another property	2
SE	Septic field expansion	1

Appendix D: Reasons for Recommendation/Decision by Agency**C1: Agricultural Land Commission****ALC - Refusal Reasons**

Code	Reason	No. Times Cited
RAP	Reduces agricultural potential	27
GAC	Good agricultural capability or potential in subject property's present state	19
SLI	Proposal represents a small lot intrusion into the ALR	8
ASL	Could negatively impact or preclude ag development of surrounding lands	6
RAC	Could increase residential/agricultural conflict	5
NC	No comments given	2
SP	Approval would set a precedent and/or increase speculation	2
HTL	Homesite too large/excessive proposed lot size	1

ALC Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Reduces Agricultural Potential	27	38%
Good Agricultural Potential or Capability	19	27%
Proposal Represents a Small Lot Intrusion into the ALR	8	11%

ALC - Approval Reasons

Code	Reason	No. Times Cited
NC	No comments given	11
NNI	Proposal has no negative impact on agriculture	5
PAC	Poor or lesser agricultural capability	5
SB	Significant barrier to farming parcel as a single unit	5
RSA	Remnant suitable for agriculture	4
BTA	Proposal represents a benefit to agriculture	3
BPE	Building permit error (special case)	1
EFC	Extenuating family circumstances (special case)	1
EHS	Eligible under homesite severance policy	1
PA	Park acquisition appropriate	1
PSQ	Poor soil quality as a reason to allow larger homesite	1

ALC Top 3 Reasons for Approval		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Proposal has No Negative Impact on Agriculture	5	11%
Poor or Lesser Agricultural Suitability	5	11%
Significant Barrier Exists to Farming Parcel as a Single Unit	5	11%

Appendix D: Reasons for Recommendation/Decision by Agency (cont.)**C2: Regional District Board****Board Refusal Reasons**

Code	Reason	No. Times Cited
NC	No comments given	15
APR	Board recommends alternate proposal not involving subdivision	5
MLR	Recommend that a larger remnant be maintained	4
PPIR	Proposed parcel size is inconsistent with the regulatory context	3
RAP	Reduces agricultural potential	1

Regional District Board Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Recommend alternate proposal not involving subdivision	5	18%
Recommend that a larger remnant be maintained	4	14%
Proposed parcel size is inconsistent with existing regulatory context	3	11%

Board Approval Reasons

Code	Reason	No. Times Cited
NC	No comments given	12
PA	Park acquisition appropriate	2
MLR	Recommend that a larger remnant be maintained	2
EHS	Eligible under homesite severance policy	2
BTA	Proposal represents a benefit to agriculture	1
EFC	Extenuating family circumstances (special case)	1
EH	Environmental Habitat Mitigation Area creation is acceptable	1
FC	Approval in lieu of any future consideration under the HSP	1
HI	Development of highway interchange acceptable	1
PI	Proof of intent to develop lot for farm purposes	1
PPZ	Recommend that proposed parcel adhere to mls in zoning bylaw	1

Regional District Board Top 3 Reasons for Support		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Applicant is eligible under the Homesite Severance Policy	2	8%
Recommend that a larger remnant be maintained	2	8%
Park acquisition is appropriate	2	8%

Board No Objection Reasons

Code	Reason	No. Times Cited
NC	No comments given	19
EH	Environmental Habitat Mitigation Area creation is acceptable	2
EHS	Eligible under homesite severance policy	2
MLR	Recommend that a larger remnant be maintained	1

Regional District Board Top Reasons for No Objection		
<i>No Objection Reason</i>	<i>No. Times Cited</i>	<i>% of all No Object Citations</i>
Environmental Habitat Mitigation Area creation is acceptable	2	8%
Applicant is eligible under the Homesite Severance Policy	2	8%

Appendix D: Reasons for Recommendation/Decision by Agency (cont.)

C3: Community Planning Services

CPS Refusal Reasons

Code	Reason	No. Times Cited
RAP	Reduces agricultural potential	23
PPIR	Proposed parcel size is inconsistent with existing regulatory context.....	18
GAC.....	Good agricultural capability or potential in subject property's present state	12
ASL.....	Could negatively impact or preclude ag. development of surrounding lands.....	7
RAC.....	Could increase residential/agricultural conflict	6
SP.....	Approval would set a precedent and/or increase speculation	6
APR.....	Recommend alternate proposal not involving subdivision	5
NBA.....	Not in the best interests of agriculture	5
SLI.....	Proposal represents a small lot intrusion into the ALR	3
ASP.....	Recommend alternate subdivision proposal	3

Community Planning Services Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Reduces agricultural potential	23	26%
Proposed parcel size is inconsistent with existing regulatory context	18	20%
Good Agricultural Potential or Capability in Property's Present State	12	14%

CPS Approval Reasons

Code	Reason	No. Times Cited
NNI	Proposal has no negative impact on agriculture	5
EHS.....	Applicant is eligible under the homesite severance policy	3
NC.....	No comment given.....	3
PAC.....	Poor or lesser agricultural capability	3
SB.....	Significant barrier to farming parcel as a single unit	2
BTA.....	Proposal represents a benefit to agriculture.....	2
FC.....	Approval in lieu of any future consideration under homesite severance policy	1
HI.....	Development of highway interchange acceptable.....	1
PA.....	Park acquisition appropriate	1
PCR.....	Proposal is consistent with existing regulatory context	1

Community Planning Services Top 3 Reasons for Support		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Proposal has no negative impact on agriculture	5	23%
Poor or lesser agricultural suitability	3	14%
Applicant is eligible under the homesite severance policy	3	14%

Appendix D: Reasons for Recommendation/Decision by Agency (cont.)**C3: Community Planning Services (cont.)****CPS No Objection Reasons**

Code	Reason	No. Times Cited
NNI	Proposal has no negative impact on agriculture	8
NC	No comment given	4
PPIR	Proposed parcel size is inconsistent with existing regulatory context	2
EHS	Applicant is eligible under the homesite severance policy	1
PA	Park acquisition appropriate	1
PCR	Proposal is consistent with existing regulatory context	1

Community Planning Services Top Reasons for No Objection		
<i>No Objection Reason</i>	<i>No. Times Cited</i>	<i>% of all No Object Citations</i>
Proposal has no negative impact on agriculture	8	47%
Proposed parcel size is inconsistent with existing regulatory context	2	12%

C4: CSRD Agricultural Advisory Committee Reasons**AAC Refusal Reasons**

Code	Reason	No. Times Cited
GAC	Good agricultural capability or potential in subject property's present state	15
MSP	Maintain the existing single parcel	14
RAP	Reduces agricultural potential	13
PPIR	Proposal is inconsistent with the regulatory context	12
SP	Approval would set a precedent or precipitate further subdivision requests	12
HP	High priority for maintenance of the ALR	7
MP	Medium priority for maintenance of the ALR	6
NBA	Not in the best interests of agriculture	6
ASL	Could negatively impact or preclude ag development of surrounding lands	4
NC	No comments given	2
EPIR	Existing parcel size is inconsistent with the regulatory context	1
LP	Low priority for maintenance of the ALR	1
RAC	Could increase residential/agricultural conflict	1

CSRD Agricultural Advisory Committee Top 3 Reasons for Refusal		
<i>Refusal Reason</i>	<i>No. Times Cited</i>	<i>% of all Refusal Citations</i>
Good agricultural potential or capability in property's present state	15	21%
Recommend maintaining the existing single parcel	14	20%
Reduces agricultural potential	13	18%

Appendix D: Reasons for Recommendation/Decision by Agency (cont.)

C4: CSRD Agricultural Advisory Committee (cont.)

AAC Approval Reasons

Code	Reason	No. Times Cited
EHS	Eligible under homesite severance policy	6
NC	No comments given	5
BTA	Proposal represents a benefit to agriculture	1
EH	Creation of an area for environmental habitat is an acceptable use	1
NNI	Proposal has no negative impact on agriculture	1
RSA	Remnant suitable for agriculture	1

CSRD Agricultural Advisory Committee Top Reason for Support		
<i>Approval Reason</i>	<i>No. Times Cited</i>	<i>% of all Approval Citations</i>
Applicant is eligible under the homesite severance policy	6	40%

AAC No Objection Reasons

Code	Reason	No. Times Cited
LP	Low priority for maintenance of the ALR	4
EH	Creation of an area for environmental habitat is an acceptable use	2
EPIR	Existing parcel size is inconsistent with the regulatory context	1
HTL	Homesite too large/excessive proposed lot size	1
NNI	Proposal has no negative impact on agriculture	1
PAC	Poor or lesser agricultural capability	1
RAP	Reduces agricultural potential	1
SP	Approval would set a precedent or precipitate further subdivision requests	1

CSRD Agricultural Advisory Committee Top Reasons for No Objection		
<i>No Objection Reason</i>	<i>No. Times Cited</i>	<i>% of all No Object Citations</i>
Proposal is of Low Priority for maintenance of the ALR	4	33%
Environmental Habitat Mitigation Area creation is acceptable	2	17%

Appendix E: CSRD Staff Report - ALR Application Summary (2000-2005)

The following table was first published in a staff report by the Regional District of Comox Strathcona (2005).

Percentage of Subdivision Applications Approved by Agency 2000-2005		
	No. Subdivision Applications Reviewed	Percentage of Subdivision Applications Supported/Approved
Agricultural Land Commission	19	84%
Regional District of Comox-Strathcona	19	84%
Community Planning Services	19	63%
CSRD Agricultural Advisory Committee	18	28%

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