

June 22, 2023

To: The Salt Spring Island Local Trust Committee (cc: Russ Hotsenpiller)

Re: Proposed Bylaw 530

Dear Trustees,

I am writing yet again to express my continued concern with the latest version of proposed Bylaw 530 with only minor changes to the one strongly criticized in September 2022 and deferred until after the local elections in October. Once again, I urge you to take this Bylaw off the table until further necessary improvements are made, alternative processes are explored and a consensus reached with the Salt Spring community, including concerns expressed by First Nations.

Yes, the housing situation on our island must be resolved but the proposed Bylaw 530 is certainly **not** the best way to go.

A much more effective process for the Local Trust Committee is one that would directly provide affordable housing through priority collaboration with the CRD (and the new Local Community Commission), BC Housing and any Federal housing funding. This would provide for a planned, limited number of rental housing units in preferred locations with controlled rents. The best example can be seen at Croftonbrook. I believe this approach is consistent with the Integrated Housing Framework proposed by Salt Spring Solutions.

What are the objections to the proposed Bylaw 530?

a. It does not guarantee that sufficient new housing will be provided, relying instead on private property owners to respond.

- It relies on an “expected 7-10%” uptake by property owners instead of establishing a limit to the number of units
- The proposed upzoning of all eligible residential properties increases their land values **whether they provide an Accessory Dwelling Unit or not**. This means higher property prices for all those included (an expected further 90-93% of properties), perpetuating the concerns over rising real estate costs on SSI.

*See report by Patrick Condon, UBC, February, 2021
(<https://www.planningreport.com/2017/08/14/learning-vancouver-housing-affordability-myth-supply-side-densification>)*

b. It does not establish any control over rental rates that need to be “affordable”.

- It is astonishing that the Bylaw makes no provision for ensuring that any additional accessory dwellings would indeed be “affordable” under any accepted standard (its primary goal). There must be a designated authority (or Housing Agency) to manage the program, to verify that all such dwellings are eligible, are affordable, in an acceptable location and meet all the building codes.

c. It does not effectively limit zones to areas that would support climate action policies.

- The OCP provides goals and policies to address the urgent need to reduce GHG emissions, focusing on existing areas that are more developed rather than more remote locations.
- There is a serious housing crisis on Salt Spring as there is in many other communities. But there is an even more devastating global **Climate Crisis** that the Islands Trust Council declared in 2019. Unprecedented weather events in recent years have confirmed that we are in a crisis.
- Reducing our GHG emissions by 50% from 2007 to 2030 will need appropriate action by all levels of government, every business and organisation as well as individuals. It has been said that all Trust decisions must now be made through the lens of climate change.

d. It is clearly not consistent with the current Official Community Plan.

- The OCP must be considered in its entirety, not just choosing those policies that are claimed to support a bylaw and ignoring ones that do not. If any element in the proposed Bylaw 530 is inconsistent with the OCP, the whole Bylaw must follow the approval process.
- As a former Local Trustee, I worked on and helped to adopt the current OCP in 2008, setting updated policies for the Salt Spring Island Local Trust Committee. As far as I know, many of the policies have still not been translated into effective Land Use Bylaws, which must always be consistent with the OCP.
- The OCP has numerous Residential Land Use Objectives and Policies that should, but fail to, inform this proposed Bylaw, including:

OCP B.2.1.2.1 Zoning changes should be avoided if they would likely result in a larger island population than is expected under the development potential zoned in 2008. Exceptions to this policy are to be **few and minor and only to achieve affordable housing and other objectives of this Plan.**

OCP B.2.2 Affordable, rental and special needs housing
B.2.2.2.15 (Secondary suites)

- consider the **use of housing agreements** to ensure that suites are affordable and to address occupancy
- consider **limits on the numbers and location of secondary suites** to minimize dependency on private automobiles.
- make zoning changes **incrementally** and consider an **annual registration system**

e. First Nations have submitted their objections to the Bylaw in their letter to the LTC last year. There must be a resolution to their concerns before you proceed any further with this Bylaw.

If proposed Bylaw 530 is adopted, you have promised a review of the results after two years, yet you have no plans to monitor the uptake or the potential impact of the Bylaw on house prices.

I hope you will require staff to update the current build-out population on Salt Spring as well as the resulting potential population created by proposed Bylaw 530 before taking any further action. A

long-term assessment is needed of a future Salt Spring Island and its capacity limits on housing, water supply and waste disposal as well as the protection of our treasured natural environment.

I am still concerned over the lack of any reliable assessment of the 2013 LTC program for secondary suites and cottages on over 1,500 residential lots to see how many additional affordable housing units were actually provided and met all specified criteria. A survey could be carried out if you know which properties were involved.

Finally, any proposed amendments by a Local Trust Committee must comply with the Islands Trust Policy Statement, be approved by the Trust Council Executive Committee and finally by the Provincial Ministry. All of which takes more time.

Conclusion

I still believe that public housing (as opposed to private housing) on Salt Spring, including urgent housing for workers and low-income residents is best provided primarily by well-funded government programs (e.g., Croftonbrook, SS Community Services), not hoping and waiting for private land owners to respond. Working more closely with the Regional District and Provincial/Federal Governments as well as community organisations seems to be accomplishing more success.

Peter Lamb

Former SSI Local Trustee, 2005-2008