

Recommendations

These recommendations place Gabriolans’ social needs – in this case, for affordable housing – within the context of protecting Gabriola’s unique ecology. These recommendations do not follow the same order as the survey analysis; instead, we have pulled together lessons from the survey findings to address one question: how do we protect biodiversity and freshwater resources while recognizing that “the islands are first of all an existing community of people, and the welfare of those people, and those who join them and come after them, must always be a primary concern of the Trust” (Islands Trust 1974 Policy document)?

The recommendations that follow are interconnected, focusing on managing growth, and conserving biodiversity and water through policies broadly applied across the island, and affordable housing policies focused on approaches that produce the greatest number of housing units with the least impact on the environment and groundwater resources. These recommendations represent actions that received strong support in the surveys. We conclude with recommendations that address how all of this work can be accomplished.

Growth Management Strategy

Objective: To ensure that growth on Gabriola is managed and gradual, balancing human and environmental needs to ensure long-term sustainability

Although limited, the LTC has some tools to limit the creation of new densities and/or to ensure any densities created support either social or biodiversity objectives or both. It is important to note that only the Province has authority to approve subdivisions, however the LTC can establish regulations regarding the rezoning of properties. Managing growth must ensure the needs of the human community are understood and addressed in the context of ensuring biocultural diversity.

To accomplish this, we ask the HAPC to recommend that the Local Trust Committee establish a growth management strategy.

This strategy should focus on articulating a clear understanding of what appropriate growth would entail and implementing necessary actions to curtail the negative impacts of unmanaged growth. These actions include the following:

- Clearly define what the OCP terms ‘gradual’ and ‘appropriate’ growth mean
- Implement a policy requiring all subdivision/rezoning applications contribute to an increase in affordable housing stock

- Establish a new regulation to be applied to rezoning applications to permit an increase or transfer of density only if a percentage of lots in each subdivision is protected with a housing agreement to ensure affordability as rental units or at time of sale and re-sale in perpetuity
- Establish regulations that set a minimum lot size requirement (e.g., 2 hectares) for subdivision rezoning applications, and
- Implement policies to facilitate willing owners of subdividable or adjacent lots to voluntarily reduce their density potential through rezoning or lot consolidation, under the condition that those densities would be deposited in the Density Bank for creating affordable housing elsewhere on the island.

Biodiversity Conservation Strategy

Objective: To ensure the recovery and long-term sustainability of our endangered Coastal Douglas-fir ecosystem

Survey respondents expressed strong concerns about protecting the Coastal Douglas-fir ecosystem. However, there is currently no definition of the concept of biodiversity in the Official Community Plan. Effectively addressing this pressing concern will require taking community-wide action. The strategies recommended below are aimed at achieving island-wide impacts rather than relying on case-by-case applications and a piecemeal approach and were identified as the most effective approaches by survey respondents.

We request that the HAPC recommend a biodiversity strategy to the LTC with the following elements:

- Clearly define the concept of biodiversity in the OCP, for instance, the difference between biodiversity or biocultural diversity which incorporates the role of human activity.
- Implement more results-oriented regulations to protect biodiversity including:
 - Developing new policies and regulations to protect and restore CDF ecosystems on private properties (e.g., restrictions on tree cutting)
 - Establishing new Development Permit Areas to protect and restore CDF ecosystems in high priority areas of the island
 - Developing new policies which prioritize parkland dedication at the time of subdivision, if it results in protection of CDF ecosystems

- Collaborate with the RDN and other partners to:
 - Advocate that the Regional District of Nanaimo parks department prioritize parkland dedication (when it is triggered at the time of subdivision) to protect CDF ecosystems
 - Advocate that the RDN ensure management planning and implementation of existing and new parklands prioritizes the protection of CDF
 - Require new dwellings, approved through rezoning, to be constructed to meet BC Energy Step Code Requirements, and to consider extending this requirement to all new construction, including commercial, institutional and multi-family developments, and
 - Develop a public education program to encourage homebuilders and owners to apply Universal Design principles when designing new homes.

Freshwater Conservation Strategy

Objective: To ensure the protection and sustainable management of freshwater resources

Freshwater conservation was a constant theme throughout all three surveys. There was strong support from survey respondents for the entire array of water policy options.

We ask the HAPC to recommend an aggressive groundwater protection strategy to the LTC, with the following components:

- Implement new policies requiring that subdivisions and redevelopment of residential properties meet higher water conservation standards by:
 - Establishing new proof of water regulations requiring that new subdivisions exceed the provincial minimum standard
 - Establishing new regulations requiring rainwater collection and storage for new residential development
- Establish new regulations that would require groundwater monitoring and data collection for new commercial, industrial, institutional and multi-family developments
- Advocate to the RDN to increase the capacity of the current *Rainwater Harvesting Rebate* program to meet demand
- Develop policies and regulations that require retention of forests and watershed ecosystems to promote groundwater recharge, and,

- Develop and distribute informational materials to all householders and new residents regarding water conservation activities that individual households can undertake, (for instance, see the Salt Spring Island Water Stewardship initiative <https://saltspringcommunityalliance.us17.list-manage.com/track/click?u=1953e744e01bd7cb2f320440c&id=a218ee1760&e=1f0b9beedb>).

Affordable Housing Strategy

Objective: To ensure a timely supply of affordable, appropriate housing that meets the needs of Gabriolans in a way that minimizes impacts on biodiversity and freshwater sustainability

Ensuring a supply of affordable, appropriate housing will require a strategy that provides the required number of units in a way that has the least impact on biodiversity and water. To do this we recommend an affordable housing strategy that prioritizes multi-unit projects appropriately sited and located, along with targeted activities for dispersed accommodation to address specific needs (e.g., elder care, extended family accommodation).

We ask the HAPC to recommend the following actions to the LTC to achieve housing, biodiversity and water objectives:

- Set housing targets and timelines by identifying the number and proportion of units to be achieved through multi-unit projects and through targeted dispersed initiatives such as secondary suites, mixed commercial/residential and flex zoning (implementation is addressed in the *Governance* section following).

Strengthen multi-dwelling proposal criteria. The following actions should be taken to ensure that the criteria for assessing multi-dwelling proposals meets the needs of low to moderate income households, is effectively and fairly managed, and has the lowest possible impact on the environment and water.

To achieve this, we ask the HAPC to recommend to the LTC, the following actions:

- Expand the housing need criteria to include any low-income households and low to moderate income households by adjusting the affordability definition as necessary
- Retain current requirements for housing agreements for affordable housing
- Add a provision to allow a mix of affordable and market options to ensure project viability

- Review the literature regarding the provision of common areas such as kitchen and recreation facilities in multi-dwelling projects and include in multi-dwelling proposal criteria and in housing agreement requirements, if warranted
- Remove the requirement that multi-dwelling affordable housing for low-income families are to come *only from banked densities* (see recommendations for Managing Growth above).

Revise secondary suite policies to target housing that addresses specific needs (e.g. distributed housing, worker housing, caregiver housing). Currently efforts to ensure rental housing rely on the regulation allowing secondary suites on properties of 2 hectares or larger. If all parcels were developed with secondary suites, it would increase the rental housing stock but would not guarantee affordability. Therefore, creating policies to allow secondary suites on properties smaller than 2 hectares, and to allow flex zoning for all residential properties must be considered carefully. There are three issues that must be addressed. First, survey responses showed that property owners perceived some serious barriers to offering secondary accommodation; therefore, there is no way to guarantee that property owners will create the necessary stock, nor that it will be affordable. Second, expanding the potential to create additional secondary accommodation on properties smaller than 2 hectares may create an increased environmental burden on biodiversity and water conservation. Finally, allowing flexible zoning to meet household needs (such as the need for caregiver, or family member accommodation) will be difficult to oversee.

In consideration of these challenges, we ask the HAPC to recommend to the LTC, the following actions:

- Retain the current policies regarding secondary suites on properties 2 hectares or larger but explore the implications of reducing the upper limit to allow secondary suites on properties of 1 hectares to 1.99 hectares. To address ecosystem and freshwater conservation conditions, all building permit applications must meet water, sewage and energy conservation objectives
- Given property owners concerns about the responsibilities of being a landlord, advocate with the RDN (responsible for affordable housing within the RDN) to create or build on existing tenant/landlord support programs which may encourage more property owners to create secondary accommodation
- Replace the term “secondary suite” with “secondary accommodation” to more accurately reflect the full range of secondary accommodation options (e.g., suite, detached cottage, etc.)
- Explore flexible zoning to meet targeted housing needs in residential zones. Flex zoning could be a way of creating increased capacity to provide caregiver and family member housing and had strong conditional support in the survey. The

challenge with this option is to ensure that the accommodation is used for the intended purpose (e.g., caregiver, family member) rather than becoming part of the existing illegal accommodation stock. To address this, we recommend that flexible zoning in residential zones be conditional on having a mechanism in place to ensure the prescribed usage (e.g., Temporary Use Permit).

Increase housing units in commercial and institutional zoned properties.

Currently, only one housing unit is permitted per commercial parcel and no units are allowed in institutionally- zoned properties. Increasing housing availability in existing and new developments may address the needs of workers, and one and two person households.

We ask the HAPC to recommend the following actions to the LTC:

- Explore options to increase the number of residential units for commercial zoned properties including transferring densities and increasing densities contingent on water, sewage and environmental considerations and that units would remain as rental units (rather than strata title market units)
- Extend the policy to include institutional zoned properties
- Require the property owner to sign a housing agreement assuring that units will remain as rental units with a mix of affordability guaranteed.

Governance, Oversight and Public Education

The Local Trust Committee can implement policies and regulations to address managed growth, biodiversity and water conservation objectives but it has no mandate or capacity to oversee the implementation of an environmentally responsible affordable housing plan. Implementing these strategies will require the time of Trust planners as well as the capacity to undertake public engagement activities, monitor the impacts of policy changes, track progress and recommend course corrections. These latter activities are outside the scope of the planners' duties. Accomplishing the objectives outlined above will require funding and the governance capacity to oversee this project.

As mentioned earlier in this report, this public engagement process would have cost over \$70,000 to conduct had the individuals on the committee, the majority of whom worked for free, billed for their time. If the Islands Trust is truly committed to protecting biodiversity, conserving freshwater and addressing affordable housing, it will need to commit multiyear funding to ensure the important objectives outlined above are met. This is not a burden that falls solely on the Trust, but the Trust must exercise leadership in getting other partners to the table to contribute their fair share.

The success of the implementation of the growth management, biodiversity, water conservation and affordable housing strategies will require resources, governance, oversight, and evaluation.

To achieve this, we ask the HAPC to recommend the following actions to the LTC:

- Establish a Housing Affordability and Managed Growth Planning Commission made up of volunteer commissioners appointed by the LTC and supported by a paid consultant and LTC staff. The Commission would be responsible for overseeing the implementation of the four strategies (growth management, biodiversity, freshwater conservation, and housing affordability) and ensuring the work is aligned with the ongoing work on reconciliation and climate change. Its responsibilities would include:
 - Planning and administering different aspects of the strategies (for instance, if there are housing agreements that need to be monitored, how would that occur)
 - Setting targets and timelines in consultation with the LTC
 - Evaluating progress so the LTC will know when the strategic objectives have been achieved and to what degree (e.g., hectares of CDF ecosystem protected, units of housing created)
 - Providing ongoing public information to increase public knowledge
 - Implementing public engagement activities as the strategies are developed and rolled out.
- Provide appropriate funding to support the implementation of affordable housing, biodiversity and water conservation strategies by:
 - Establishing an appropriate budget to support the implementation of the strategies
 - Committing appropriate Island Trust funding,
 - Working in collaboration with the RDN (the body responsible for the regional housing strategy) and other community partners to acquire the necessary resources to staff this initiative
 - Exploring the option of a tax requisition to finance this initiative (through both the Local Trust and RDN).