

From: Elizabeth White [REDACTED]
Sent: Tuesday, January 13, 2026 2:58 PM
To: Islands2050
Subject: Response to request for public input on the Islands Trust Draft Policy Statement
Attachments: EW Letter to Islands Trust Jan 13, 2026.pdf

Dear Islands Trust,

Attached as a pdf is my input on the Islands Trust Draft Policy Statement.

Thank you for the opportunity to provide input.

Elizabeth White

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To: Islands Trust, Jan 13, 2026

Re: Islands Trust Draft Policy Statement

Thank you for the invitation to provide input to the Islands Trust Draft Policy Statement. I am fortunate to have lived on Salt Spring Island as a year-round resident for 30 years as of July 2026. During those years I have been a Salt Spring property developer, a small business owner, and a community volunteer. In response to the Islands Trust request for public input on the Islands Trust Draft Policy Statement (TPS Draft) dated July 29, 2025, I reviewed the proposed draft and compared it with the April, 2003 consolidated version (2003 TPS) that it will replace and offer the following comments.

1. The inclusion of First Nations is timely and welcome.
2. Omissions in the TPS Draft leaves its interpretation open. The Definitions in the 2003 TPS specify how key words and phrases are to be interpreted. The TPS Draft replaces Definitions with a Glossary, which, while useful, I believe has no legal status. Definitions are essential, perhaps short and referring to the relevant glossary description. Several key words and phrases are missing from the Glossary, of particular concern to me are 'affordability' related to housing, and 'environment', the latter needs to be defined as referring to the natural environment.
3. There is no emphasis in the TPS Draft on the need to limit growth. The TPS Draft refers to "Managing Growth and Development". This language is weak and inadequate. Protecting the islands from over-development is what the Islands Trust Act is intended to do and involves LIMITING growth and development. Directive policies that require limits to growth and development are essential if the environment and rural character of the islands are to be protected. This is a balancing act in that community health and well-being depend on provision of adequate infrastructure, but without clearly established limits to growth in the TPS, in my opinion there is a real risk of the major islands in the Trust area becoming exclusive playgrounds and havens for the very wealthy, with services provided from Vancouver Island and the Mainland.
4. By default, the TPS Draft emphasises the creation of market housing and appears to be written for the benefit of developers. The TPS Draft Glossary does not include any terms related to affordability or affordable housing. The only entry for housing is "Housing Diversity (that) refers to the range of housing types and tenures in a community that allow people to find appropriate housing as their needs change over time, and at all stages of life." A Glossary entry describing the need for housing that is affordable and suitable for islanders, whether they be workers or long-time residents, is needed, along with a definition of affordability. And most importantly, a Directive is needed to ensure that affordable housing is protected by monitored covenants. Without such protection, 'affordable housing' reverts to market housing at the whim of the owner.

5. Lack of clarity in the TPS Draft. The 2003 TPS uses the directive 'shall' almost 50 times and the intent of the clauses where it is used is clear. The TPS Draft uses the directive 'shall' 19 times. Of particular concern, on page 7, under the introduction to "Directive Policies", the toothless term 'should' is used rather than the directive 'shall'. It appears to me that there are no Directive Policies, since Local Trust Committees are not legally bound by 'should', only by 'shall'. Therefore it could be argued that the inclusion of 'shall' later under "Directive Policies" is not binding. In any event, the language appears woolly to me and open to legal challenge. The 2003 TPS includes definitions and numerous footnotes, often repeating a definition on pages where the term is used. This strategy provides clarity and certainty. The TPS Draft has no definitions and no footnotes.

In conclusion, the TPS Draft in its present form is toothless and inadequate, unfit for purpose. Its deficiencies could, in my view, be addressed by staff with input from legal counsel. Whether the resulting document would be approved by Trust Council is unclear.

Yours truly,

Elizabeth White
Salt Spring Island, Jan 13, 2026