

From: KEES LANGEREIS [REDACTED]
Sent: Tuesday, January 27, 2026 1:52 PM
To: Islands2050
Subject: submission on the draft TPS
Attachments: defintion of land use density and intensity.pdf

Please find attached a document related to the definition of "land use density and intensity".

Thank you,
Kees Langereis

To: Islands 2050

Date: January 28, 2026

From: Kees Langereis

Re: Draft Policy Statement definition of “land use density and intensity”

The Glossary in the Trust Policy Statement has the following definition of “*land use density and intensity*”:

Land Use Density and Intensity

Density is regulated through zoning. Density may be defined by the number of units per given area of land. Density may also be measured by dividing the built area including all floor area, by the total area of the lot, e.g., floor area ratio (FAR).

Intensity of use refers to the impacts of different types of land uses, e.g., certain types of commercial or industrial uses could be more intense with more impacts than residential or vice versa.

Of note, density and intensity of use can combine to increase cumulative impacts of the land use.

RECOMMENDATION:

Delete the definition from the Glossary.

Following are my reasons for the recommendation.

Land use density:

The Glossary lists two possible ways to define density:

- (a) number of units per given area of land, or
- (b) dividing the built area including all floor area, by the total area of the lot, e.g., floor area ratio (FAR).

As constructed the definition posits two options but since they are in separate sentences not connected by an “or” or “and”, I assume the word “also” in the second sentence acts as that connector. In other words, both can be applied as density measures.

However, there are other Local Government Act land use powers that also address density of land use.

Examples include lot coverage, building heights, lot line setbacks and, applicable to subdivision, the minimum and average lot size. Why is the term “land use density” limited to just two ways in the definition?

If the intent was to provide some examples, the description should reference other possibilities by adding text such as “and including but not limited to”.

The phrase “dividing the built area including all floor area, by the total area of the lot, e.g., floor area ratio (FAR).” Is confusing. At the lot level, I understood floor area ratio (FAR) to be the ratio of the “total floor area” of buildings divided by the “total lot size”. While generally referring to “buildings”, my understanding is that “floor area” could also include the footprint of structures (i.e. structures with no roof, hence without floor levels).

Is that the purpose of the phrase “built area”; to capture “footprints” of structures? Otherwise, an example of what “built area” includes is needed. The ending phrase “e.g. floor area ratio (FAR)” adds to the confusion in that it posits the existence of approaches other than FAR. Had it said “i.e.” I would take it is a describing FAR. But it doesn’t.

If FAR is intended to include footprint of structures, it would be clearer to say something like: total floor area of all buildings and footprints of structures.

RE: the phrase “defined by the number of units per given area of land”. This is open ended and could be applied as units per lot or units per another specified geographical area. The term “units” can include “persons” (i.e. population density). While land use bylaws cannot limit population directly, it can indirectly by limiting the number of dwelling units allowed per lot and setting limits on home sizes. This is appropriate given the intent of the Trust Object is to manage and when necessary, limit development. Population numbers are a density metric.

“Density” is only used in two Directives (ie 3.4.11 and 3.5.1).

Intensity of land use:

The term “intensity” is defined as “referring to impacts” of different land uses. Is this intended to be a legally binding definition of the word “intensity” or is it background information for the public? If binding, then policies using the word need to refer to those impacts. The term “intensity” is only used in one Directive (i.e. 3.5.1 Freshwater Sustainability) and in one other Glossary definition (i.e. protection).

Final comments:

The definition is presumably a construction of local planning services. I say this as a search on the terms “density” and “intensity” leads to other definitions. Some indicate FAR as a measure of “intensity”. There is variance in how these terms are defined. The following link is to one report distinguishing density and intensity: <https://annforsyth.net/wp-content/uploads/2018/05/db9.pdf>

The last sentence of the definition referencing combination of different uses and cumulative effects is more a contextual statement than a definition. This relates to my previous submission on the purpose of the Glossary.

Given all the above, either amend the definition to clarify intent or delete the definition given its limited use in the TPS.

Thanks for your consideration.