

From: Elizabeth White [REDACTED]
Sent: Thursday, January 29, 2026 8:45 PM
To: SSIInfo <ssiinfo@islandstrust.bc.ca>; Timothy Peterson <tpeterson@islandstrust.bc.ca>; Laura Patrick <Lpatrick.com>
Subject: input for Draft Trust Policy Statement

Dear Local Trust Committee,

At the Harbour House meeting on January 13, attendees were invited to submit specific wording changes to the Salt Spring LTC prior to February 1 so that these submissions would form part of the public record for the next SSI LTC meeting.

Accordingly, I have attached my submission for the public record detailing some suggestions for specific word changes to the Draft Trust Policy Statement to improve content and clarity and better meet the Trust Object. I have also attached my January 13 submission to the Islands Trust, which is referenced in, and forms part of, today's submission.

Thank you for considering these suggestions.

Yours truly,

Elizabeth White

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sent from the unceded territories of Hul'qumi'num and SENĆOTEN speaking peoples

To: The Salt Spring Island Local Trust Committee
From: Elizabeth White, Salt Spring Island, Jan 29, 2026

Re: Islands Trust Draft Policy Statement

Thank you for the invitation to provide input to the Islands Trust Draft Policy Statement. In follow-up to my letter to the Islands Trust dated Jan 13, 2026 and in response to the request for specific wording changes, I offer the following comments.

Please accept as included herein the points made in my Jan 13 letter regarding the weaknesses of the current draft TPS, including the need for legally enforceable definitions.

I suggest using the term "**Non-Market Housing**" because it encompasses all housing needs and tenure types and is already used by public agencies and the general public. In my view, non-market housing designated for existing populations meets the Trust Object to limit population growth. With regard to new definitions of affordability that may be included in Salt Spring's revised OCP, these definitions will in practice be overruled by CMHC's criteria that apply to mortgage financing across Canada. It would be prudent to ensure that the TPS and OCP revisions are congruent with these criteria.

The use of Advisory rather than Directive Policies for local trust areas and island municipalities clearly does not meet the intent of the Islands Trust Act. I believe that the inclusion of a new paragraph on page 5, worded as suggested (subject to input from staff and legal counsel) provides the desired flexibility for local trust areas and island municipalities. **This new paragraph is intended to replace ALL Advisory Policies for local trust committees and island municipalities.** Clauses currently included as Advisory become Directive.

The wording suggestions provided below are those of particular concern to me, and/or where I believe my knowledge to be relevant. Where I have edited headings and clauses, underlined words are added and ~~deleted~~ words are deleted.

Page 4

Part 1: *The Islands Trust Act*

change first paragraph to read:

In 1974, the Government of British Columbia established the *Islands Trust Act* to preserve and protect the Islands Trust Area and its unique amenities and environment against unrestrained growth and development. The *Islands Trust Act* established the Islands Trust as a special-purpose provincial government agency equipped with a suite of land use planning powers and a conservation-oriented mandate to preserve and protect the region in cooperation with others. This unique governmental mandate was defined in Section 3 of the *Islands Trust Act* and is commonly referred to as the "Islands Trust Object".

Page 5

1.2—Map of the Islands Trust Area

insert description under map:

The Islands Trust Area is comprised of 13 major islands and more than 450 smaller islands and the surrounding waters in the Strait of Georgia and Howe Sound.

(page 5 cont.)

insert new paragraph:

The different characteristics of each local trust area and island municipality are part of the unique amenities and environment of the Islands Trust, and Trust Council understands that provisions in the Trust Policy Statement are not applicable to those local trust areas and island municipalities where the natural features and/or other amenities do not exist. This understanding provides flexibility for each local trust area or municipality to apply the Trust Policy Statement provisions applicable to its local conditions. All Trust Policy Statement provisions that do apply must be applied.

Page 6

1.4—Purpose and Structure of the Policy Statement

first paragraph, line 5

delete:

"that it may establish different policies for different parts of the Islands Trust Area"
(covered by new paragraph on page 5)

Page 7

~~Three~~ Two Types of Policies in the Policy Statement:

Directive Policies

delete "should" and replace with "must" (occurs twice in this paragraph)

Advisory Policies

delete entire paragraph, now redundant (covered by new paragraph on page 5)

Page 8

Part 2: Guiding Principles

Trust Council's Guiding Principles

change 2.1.2 to separate Indigenous rights and protections from protection of the environment and settler cultural heritage:

2.1.2 Prioritize ~~Environmental and~~ Indigenous Cultural Heritage Protection

To place priority on ~~preserving, protecting and restoring the environment, and~~ preserving, protecting, and supporting restoration of Indigenous cultural heritage in all decision making.

renumber 2.1.3 onwards, with changes as follows:

new

2.1.3 Prioritize Environmental Protection

To place priority on preserving, protecting and restoring the natural environment in all decision making.

(page 8 cont.)

2.1.4 **Prioritize Limits to Development**

~~Limit the Rate and Scale of Development~~
To place priority on limiting new development to that needed to sustain existing year-round populations and to service low impact sustainable tourism in order to preserve and protect the Trust Area and its unique amenities and environment.

2.1.6 **Take Guidance from the Precautionary Principle**

To be guided by the precautionary principle in all decision making to safeguard the environment and cultural heritage where there is uncertainty over the potential for serious or irreversible damage from land use changes. ~~development~~

new

2.1.8 **Protect Cultural Heritage**

To protect settler cultural heritage in all decision making.

new

2.1.9 **Foster Public Participation in Decision Making**

Foster public participation in all government decision-making processes and provide opportunities for collaborative public input in establishing and revising OCPs and regulatory bylaws.

Page 10

2.3.1 **Collaborate with the Islands Trust Conservancy Board**

To collaborate closely with, and be informed by, the Islands Trust Conservancy Board, an essential part of the Islands Trust structure, particularly in the areas of science-based conservation planning, ecosystem mapping, identification of core conservation areas and protected area networks, and protection of species and ecosystems at risk.

2.3.5 **Work Towards Provide Accessible and Inclusive Public Communications and Engagement**

To work towards provide accessible and inclusive public communications and engagement strategies that engage a wide range of residents, communities, local organizations, and British Columbians.

Page 16

Goal 4: Foster Sustainable, Inclusive, and Resilient Communities

add sentence to opening paragraph:

"Islands Trust Council recognizes that the Islands Trust Object is for the benefit of residents of the Islands Trust Area and all British Columbians, who in turn have a role in preserving and protecting this region. Island Trust Council further recognises that increased assistance from higher levels of government is necessary to support the Trust Object and will continue to request such assistance. The policies in this section support the preservation and protection of unique island character and aim to foster sustainable, inclusive, rural, and resilient island communities."

(page 16 cont.)

change heading:

Directive Policies—Limiting Managing Growth and Development

new

3.4.1 Development Limits

Limit development through land use designations that support existing year round populations and low impact sustainable tourism.

3.4.1 ~~Sustainable Development~~

~~Consider site capabilities, environmental and protected areas, and existing development patterns when determining the land use designation and appropriate locations and intensities of various uses of the land.~~

3.4.2 ~~Growth Limits Management~~

~~Limit Manage community growth and its associated impacts by directing residential, commercial and industrial development into suitable locations, to prevent development that would support population increases, sprawl, minimize fragmentation of forest lands, and avoid to prevent adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.~~

3.4.3 Impacts of Development (wording below includes text deleted from 3.4.1)

Consider site capabilities, environmental and protected areas, existing development patterns, ~~and the aesthetic, environmental, and social impacts of development~~ when determining the land use designation and appropriate locations and intensities of various uses of the land.

3.4.4 ~~Community Facilities and Services~~

~~Ensure that each community's, and local Indigenous communities', current and projected long term needs for educational, institutional, community, health, cultural, recreational facilities and services, and outdoor recreation are considered and planned for.~~

3.4.4 Climate Change Mitigation and Adaptation

Implement planning and land use management strategies ~~to support electrification, local power production, renewable energy storage, and consider nature-based~~ solutions, to minimize greenhouse gas emissions, and adapt to climate change-related vulnerabilities.

3.4.5 Hazardous Areas

Identify areas at elevated risk of natural and climate change-related hazards and restrict development within these areas including, but not limited to, areas subject to flooding, sea-level rise ~~and storm surges~~, erosion, slope instability and wildfire.

new (was 3.4.19)

3.4.9 Natural Building Materials and Techniques

Encourage construction of buildings and structures using local natural building materials and techniques, and minimize barriers to their use.

Directive Policies—Housing

renumber clauses as needed

new:

3.4.10 Non-Market Housing

Ensure that densities created for new housing shall be for non-market housing and protected by monitored covenants.

new:

3.4.11 Resilient Non-Market Housing

Support features in development applications that increase resilience such as pre-engineered prefabricated energy-efficient buildings, reduced water use, solar panels, energy storage, and similar features that support long-term affordability and liveability.

3.4.12 Suitable Locations for Additional Housing

Identify suitable locations that could support increased density for the development of safe, secure, diverse, and attainable non-market housing.

3.4.16 Short-Term Rentals

Identify and assess the impacts of short-term rental of dwellings on the availability of safe, secure and affordable housing and, ~~where necessary~~, regulate and limit the number of short-term rentals accordingly.

3.4.18 Multi-Unit Residential

Implement land use regulations for ~~non-market affordable and special needs housing and other multi-unit residential development that permit a range of potential site configurations, tenure types and unit sizes, including provision for a limited number of market units within a project if requested~~, and control form and character through development permit areas.

3.4.19 Natural Building Materials and Techniques

~~Encourage construction of buildings and structures using local natural building materials and techniques, and minimize barriers to their use.~~

Directive Policies—Agricultural Lands

new

3.5.12 Protection of Agricultural Lands outside the Agricultural Land Reserve

Identify agricultural lands outside the Agricultural Land Reserve and provide equivalent protection to the *Agricultural Land Commission Act* for current and future use, while considering down-stream impacts, wildlife habitat, and adjacent properties.

(page 23 cont.)

renumber clauses as needed

new

3.5.13 Agriculture and Natural Ecosystems

Protect productive growing areas and the natural ecosystems surrounding them by avoiding fragmentation of agricultural lands through subdivision, siting of roads, utility corridors, and other infrastructure.

~~3.5.13 Agriculture and Road Systems~~

~~Consider siting of roads and utility corridors to minimize fragmentation of agricultural lands.~~

new

3.5.14 Agricultural Water Demand Reduction

Encourage water conservation on farmland through permaculture techniques, use of greenhouses and farm ponds for seasonal rainwater collection, and other land management practices to protect groundwater quality and quantity, and watershed ecosystems, without compromising agricultural productivity.

new

3.5.14 Agriculture for Climate Change Mitigation and Adaptation

Encourage sustainable agricultural practices, including agrivoltaics and practices that result in soil carbon sequestration as stable humus, to improve agricultural capacity under varying conditions, and to reduce negative impacts from agricultural activity without compromising agricultural productivity.

I hope the above suggestions will help improve the current draft TPS. I am happy to provide clarifications if requested.

Yours truly,



Elizabeth White

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