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Subject: Feedback on Draft Gabriola Island OCP

To whom it may concern;

This letter was written after a series of conversations with several individuals and families who currently live in alternative housing situations on Gabriola. It is a synthesis of the concerns and suggestions from those conversations. The letter has been reviewed by many individuals, several on behalf of larger households. The people reviewing and supporting this letter choose to remain anonymous in order to avoid unwanted attention from the Islands Trust or Regional District of Nanaimo.

While the conversation around affordable housing often focuses on those who are most at risk, there are many people who have safe, stable homes but whose housing choices are implicitly or explicitly disallowed under current regulations. These housing choices are diverse and include RVs, motorhomes, yurts, 10x10 structures, converted sheds, cob houses and other natural buildings, and tiny homes built either by professional builders or by owner-occupants. This situation is known to the Islands Trust and other regulatory bodies through ongoing complaints and enforcement actions.

With the cost of housing access tripling over the last decade, simply surviving has become a scramble for an ever greater number of Gabriolans, some of whom are responding by seeking housing security by alternative means. Although current rules put us at odds with the Trust and other regulatory bodies, those of us who have created our own homes haven't done so out of a desire to thumb our noses at authority. We are hard-working individuals and families doing essential jobs in our community – repairing homes, caring for children and elders, running businesses and volunteering – who have been priced out of home ownership or are unable to find affordable rentals. Some of us own properties but are unable to shoulder the cost of building conventional homes. We choose to continue to live in and contribute to the Gabriola community in spite of this economic reality, and our solutions to finding housing are an adaptation to that reality.

Put simply, there are not enough affordable rentals or starter homes available to meet the needs of an economically diverse community on Gabriola. In addition, for many who own raw land the cost of building a family home that is compliant with current regulations (\$400,000 - \$750,000 *) is unattainable. Until “legitimate” housing becomes affordable for average working families, we will be forced to bend or break rules in order to secure a safe, sustainable living for ourselves and our children.

We want to follow the rules, but if they fail to encompass the reality of daily survival for everyone, there will inevitably be some who are forced to break those rules to survive.

Part of the Islands Trust's mandate is environmental stewardship. The construction industry is responsible for approximately 30% of the mass that goes into Canadian landfills every year, and we believe that measures should be taken to reduce this waste. Natural building and non-permitted tiny structures actively remove mass from the waste stream through repurposing building materials, as well as directly reducing the amount of new materials that are required for housing. The permitting process currently stands in the way of this repurposing. Allowing non-permitted owner-built tiny homes, natural buildings, and tiny homes on wheels is absolutely essential in order to protect the environment, as well as to keep housing accessible and affordable.

We recognize that the current proposed changes to the Official Community Plan are an attempt to address some of these realities. However, we have the following concerns with these proposed changes;

1) With regard to the proposed multi-unit housing and tiny home regulations:

a) Requiring permits and code compliance for tiny houses will greatly increase their cost. Furthermore, as tiny houses often include features like lofts and non-standard doors, hallways, stairs, etc. it is nearly impossible to build them in compliance with either BC building code or Mobile Home building code. Allowing tiny homes under these requirements takes a currently affordable housing option and turns it into one of the most expensive when considered in cost per square foot. **

b) Requiring a permit to park a tiny house on wheels is also extremely complicated for both land owners and renters. For example, is an RV treated as a tiny house, and therefore requires a permit? Given that tiny houses are mobile, would a permit be required each time one is moved? Does the permit apply to the movable house or to the property where it's located at the time the permit is applied for? Is a renter seeking to move a tiny house to someone else's property now responsible for obtaining their own permit, and the associated costs?

c) Requiring permits for the placement of tiny houses (and presumably RVs) opens land owners and possibly even renters up to punitive action from regulatory bodies, as often the permit process reveals other ways in which a given property or building is not in compliance with existing rules. This will inevitably have a chilling effect on property owners who would otherwise be willing to rent space for people to park tiny homes, placing more pressure on those seeking or providing stable housing to continue to break rules in order to meet the needs of the community.

d) The allocation of density based on fresh water availability fails to account for alternatives such as rain water collection and water conservation practices which can allow for more people to share land without additional impact on groundwater availability.

e) Requiring tiny houses (or RVs) to be connected to a wastewater disposal system severely limits options for renters or multi-unit housing projects compared to allowing composting toilets and grey water diversion. There are many tried and tested alternative methods of safe grey and black water disposal which could be included in the new regulations.

2) With regard to proposed 'flexible housing' changes: While we see this as another well-meaning attempt to diversify housing options and provide an avenue for non-compliant existing housing to be brought into compliance, we believe that in practice this change will fall short of its goal for the following reasons:

a) The limit of 12 units built into the proposed change comes nowhere near the number of housing units required to even bring existing units into compliance, let alone create additional opportunities for affordable housing.

b) The proposed exclusions under 2.4.2.1.3 are cumbersome and complex, and fail to reflect the reality on the ground. For example, a 40 acre property with one corner bordering a riparian area would be entirely excluded from this opportunity even if the proposed flexible housing were located nowhere near the riparian area, while a smaller property located geographically closer to the same riparian area but just outside its boundaries would not be excluded.

With regard to increase in size of subdividable properties: We believe that this has no negative impact on housing affordability or availability, and therefore we support the change.

To address our concerns, we submit the following proposals for the new Gabriola Official Community Plan;

1) Create accommodations to allow for alternative, owner-built, permit excluded homes including natural building and tiny homes, particularly tiny homes on wheels, RVs, and 10x10 structures as has been successful in other jurisdictions. Include provisions for composting toilets, environmentally friendly grey water systems, and water conservation and catchment.

2) Take resource use/conservation and water catchment into account when allocating density rather than creating blanket rules for entire areas based on estimation of available ground water and assumed use.

3) Advocate in favour of alternative housing options with other levels of government, particularly the Regional District of Nanaimo.

The proposed changes to allow multi-unit housing development and flexible housing are a step in the right direction, however we believe that more courageous action is required in order to address the needs of a diversity of Gabriolans.

Thank you for your consideration.

* Based on average estimate of \$375-\$400 per square foot construction cost. Small family home around 1000 sq ft. Average home in BC is around 2000 sq ft.

** Compare an estimated price of \$200,000 for a tiny house including pad, permits, and professional building costs or retail price to the above square foot cost. In this case, a 250 sq ft tiny home would cost \$800/sqft, or double the square foot cost of a conventional home.