From:	Sonja Zupanec
Sent:	Wednesday, June 16, 2021 9:26 AM
То:	webposting
Subject:	FW: Housing Matters Survey
Attachments:	LTC submission June 2021 supporting details.docx

Hi Wil,

Can you please post the email and attachment to the GB Housing Options and Impacts project page under Public Correspondence. Thanks! Sonja

From: Gisele Rudischer Sent: Tuesday, June 15, 2021 4:35 PM To: Gabriola Island Local Trust Committee <<u>GabriolalslandLocalTrustCommittee@islandstrust.bc.ca</u>> Subject: Housing Matters Survey

To the Gabriola Local Trust Committee

I respectfully request that before you act on the recommendations from the HAPC which includes an endorsement of the Housing Matters Group Survey, you consider the following concerns:

The Survey is the only public consultation on the housing issue and we have no idea how many residents participated; only how many answered each survey. The 1087 respondents do not represent 1087 residents. Some of the 411 respondents to Survey 1 could also have responded to Survey 2 or Survey 3 e.g. those who responded to all 3 Surveys were counted 3 times.

The Report states the recommendations represent "actions that received strong support in the surveys" however the results do not show strong support for a number of the recommendations e.g. Only 4 of 74 comments mention biocultural diversity yet it's inclusion was recommended.

A number of recommendations do not include the caveats that were part of the questions e.g. Only 31% of respondents agreed with allowing secondary accommodation on lots less than 2ha (5acres). 23% were not in support. Another 46% agreed but only if certain conditions were met. The conditions: limiting floor area and lot coverage of both dwellings, a minimum lot size, rent limits to ensure affordability and higher construction standards. The recommendation is to allow secondary accommodation on lots 1ha or more if water, sewage and energy conservation objectives are met. None of the other criteria are mentioned in the recommendation.

Only 34% supported flexible housing to allow more housing on Commercial and Institutional parcels. The 41% who said maybe had 5 or more conditions only 2 of the 5 are addressed in the recommendations. Respondents were not asked if they support an increase in density. They were asked if they supported restricting the maximum subdivision potential. Rezoning for increases in density were never proposed.

This is also the case with allowing secondary accommodation on smaller lots for caregivers or extended family. The question asked included the phrase "under certain conditions" so there is no unconditional support for this. A small majority (53%) support this with these conditions: sufficient water and sewage, limiting floor area of both dwellings, limit to number of accessory buildings, maximum lot coverage and sufficient parking and screening. The recommendation is to explore allowing, with a mechanism in place

to ensure the prescribed use (Temporary Use Permit). No mention of the many conditions the support was contingent on.

If the LTC decides to move forward on these recommendations I would like to request that the LTC include the conditions the support was contingent on.

A number of Survey questions were preceded by incorrect or incomplete information e.g. the preamble to Survey 1, Question 2 presents a choice between two criteria to address needs an income based model or a housing agreement model without informing respondents that both already exist in our OCP.

The number provided on the projected potential population is inaccurate. The stated increase of 6,854 is 2,000 less than the buildout number after all residential densities are included. It was not recognized in the Report that these numbers were incomplete and residents were misled to believe that the population potential was much less than it really is. How can we know if respondents might have answered differently if they were aware of the actual population potential?

There is no consistency across the questions. Analysis of responses is extensive for some questions (Survey 3, Q 9) and non-existent for others (Survey 1, Q 5).

A number of questions are not clearly articulated and can be interpreted in more than one way e.g. Survey 3, Question 6 and 9.

Some results have been misrepresented e.g. Survey 1, Question 2 in which an affordability test such as 30% of income received the highest level of support yet was not recognized in the Conclusions. Although 43% of respondents agree that maintaining existing zoning ensures managed growth and only 37% disagreed. The 43% was described as "comparatively little support".

There is bias in the presentation of comments. Overwhelmingly the comments quoted are those that support increases in density or those in support of secondary suites specifically. Less than a handful of comments quoted represent the views of those who do not support increases in density. We rarely hear what their concerns are and why they answered as they did.

Most important is the fact that only 24% of respondents support an increase in the residential population potential and 23% want to maintain current potential. Concerns with increases in density are noted but the report only speaks to the 53% who want a decrease in density. Obviously, those who want a decrease do not support an increase. A full 76% do not support any increase in density. This should be reflected in the recommendations.

Please read the supporting details in the attachment.

**Gisele Rudischer** 

#### SUPPORTING DETAILS

#### Survey #1

"A total of 411 people responded to this survey, representing 1 response for every 8 Gabriolans aged 19 and over."

Apparently, this was an error and it should read "over 19 years of age. By my calculation it is 3705 persons over 19 (from the Census and the Medical registrations) which works out to 1 in 9. These estimates are only based on the number of respondents to each Survey and not to specific questions so not a meaningful statistic.

#### Q1: Land Status

Only 3 % of 408 respondents said they had precarious housing. (12 people). It's misleading and confusing to express this as 17% of 17% of respondents.

The preamble to Question 2 offers 2 approaches to address particular needs. The first approach claims to be a representation of the Gabriola and Salt Spring OCPs but they are not accurate representations as they omit any reference to median income. This is an important omission.

**Q2:** The Gabriola OCP includes several criteria intended to help the Local Trust Committee (LTC) decide whether or not to approve affordable housing proposals. These criteria are listed below.

Respondents were asked to rank the importance of these various criteria.

### The Report speaks to "multi-dwelling affordable housing" but the Survey question does not identify the criteria as applying only to multi-dwelling proposals.

"The rents that will be charged meet an affordability test, such as 30% of a household's incomes."

### The first criteria question doesn't reflect the OCP as stated. The OCP definition includes reference to the median income.

#### Conclusions: Question 2

"Overall, the highest ranked criteria are all related to administrative guidelines and processes about how proposals would be evaluated and managed, with one exception – the impact on water, waste, greenhouse gas emissions and energy use."

# This is a misrepresentation of the results. 92% of responses were about the affordability test (30% of household income). That is higher than 2 of 3 administrative processes and higher than impact on water but it isn't even mentioned.

**Q3:** Would you support expanding the categories of need to include any of the following? Any low-income households; low to moderate income households?

"As noted above the OCP currently only permits "multi-dwelling affordable housing" for special needs residents, seniors, and low-income families. Respondents were asked if they would support expanding the categories of need to include Any Low-Income Households or Low to Moderate Income Households."

### Again, the question does not include "multi-dwelling" and it could be wrongly interpreted to mean any affordable housing. The question doesn't make sense since low-income is already a category of need

The 5 responses quoted speak to the need or desirability. No comment quoted that speak to concerns such as definition, rural character of the island, etc. as mentioned in the Qualitive Responses.

# Only 3 % of 408 respondents said they had precarious housing. (12 persons). It's misleading and confusing to express this as 17% of 17% of respondents.

**Q5:** Would you support a re-write of policies and regulations to enable secondary suites to be constructed on Gabriola Island on residential parcels that are smaller than 5 ha/5 ac?

The words: "to be constructed on Gabriola Island" can be construed to mean these would only apply to new construction or they could be interpreted to include existing illegal secondary suites. It is unclear and since this question doesn't report the nature of the comments, we have no way of knowing how this was interpreted by respondents.

#### General Findings:

"314 respondents answered this question, and 96 people skipped it (23%). Of the respondents, one-third support allowing secondary suites on smaller residential properties unconditionally, 46% are supportive but with conditions, and 13% do not support the change."

# 31% is not one-third. The 10% of respondents who chose "other" are not included and there is no reporting on the number of comments received. When I asked the Housing Matters Group how many comments were received, I was told that 33 comments were received from those who chose the option "other". It appears that 177 comments were received but there is no summary of the qualitative responses as with most other questions and no comments quoted.

#### **Conclusion Question 5**

"The vast majority (77%) of respondents support allowing secondary suites on smaller lots, but the majority of those would require some form of conditionality (as explored in Question 6)."

# Given the promotion of secondary suites in the material, this is one of the most consequential questions yet the question is unclear, there is no number of comments received, no summary of the qualitative responses, no comments quoted and a very short conclusion. The entire reporting on this question covers less than one page. One can't help but wonder why.

**Q6:** If the LTC was to consider allowing secondary suites on properties less than 2 hectares / 5 acres, please rate the importance of the following conditions – 312 responses – 63 comments – 98 skipped it (24%)

Some of these option descriptions have been shortened e.g. setting limits o floor area/lot coverage <u>for</u> <u>principal dwelling and secondary suites</u> as essential or desirable and setting rent limits to ensure affordability as essential or desirable. This is the only question that does not have a graphic that would more clearly show that a significant majority support all the conditions listed and more.

#### Conclusions: Question 6

"Fewer than one-third of respondents support allowing secondary suites on properties smaller than 2 hectares / 5 acres. 46% feel it would be appropriate, but their support comes with significant caveats regarding ecological protection, limiting floor area and lot coverage, specifying a minimum lot size, requiring rent limits to ensure affordability, and requiring higher construction standards."

#### The conditions should be as they appear in the question. (See the underlined portion above.)

#### Survey #2

#### Q1: Land Status

# Only 2 respondents said they are precariously housed. To express this as 8% of 8.5% of respondents is confusing and isn't useful information.

**Q2:** Should the Local Trust Committee draft new policies to specifically address protection of biodiversity and restoration of the natural environment on the island?

#### Conclusions:

"The responses to this question show clear support among respondents for incorporating the concept of biodiversity into the Official Community Plan. However, the concept itself needs to be clearly articulated – for instance, delineating the difference between biodiversity or biocultural diversity, which incorporates the role of human activity."

There's nothing in the comments referred to that would suggest that the concept of biodiversity needs to be clearly articulated. The question was about biodiversity, not biocultural diversity. Only 4 commentators or 5% of 74 support adding biocultural diversity and 12% support the status quo or oppose any new development. A third of the comments quoted favour adding biocultural diversity.

#### Survey #3

#### Background:

"Four growth scenarios (see Appendix 8) predict a regular resident population of between 4,631 and 6,632 people in the future. These scenarios are based on the number of lots that are currently undeveloped (490), subdivision potential (158 lots), and secondary suite potential (636). (Note that the scenarios do not take into account the roughly 1000 acres set aside for Treaty negotiations between the Snuneymuxw and the federal and provincial governments.)"

As previously mentioned, there is no recognition here that the build-out number is based on an incomplete map and did not take into account all the residential potential. Taking these into account increases the total by 2,000 people. We do not know whether the actual higher number of population potential would have made a difference in the answers from respondents.

**Q2:** Would you support more flexible zoning for commercial and institutional parcels in order to incentivize the construction of rental or market housing units during redevelopment?

#### The preamble between Question 1 and Question 2 reads like a promotion of secondary suites. e.g. "However, growth can be managed through a careful suite of policies addressing subdivisions and permitting of uses that would result in increased density such as the creation of secondary suites". This seems irrelevant to the following question which doesn't address subdivision or secondary suites

41% said maybe and 25% said no, 34% said yes and 7.5 % said other

"Roughly 75% of respondents are either conditionally supportive (Maybe = 41%) or unequivocally supportive (Yes = 34%). Although only 18% indicated their lack of support by answering No, the qualitative responses from the 7.5% of respondents who chose Other are mostly unsupportive of this option. It would therefore be appropriate to categorize all of these together, as 25% who are not in support of this option.

# 34% said yes and 26% of respondents said no and 41% said maybe. Of the 2 comments quoted, one is a maybe and the other represents the 1% who favour secondary suites. There are no comments that represent the 26% who are not in favour.

**Q3:** If you answered Yes or Maybe to Question 2, please indicate the conditions under which you would support more flexible zoning for commercial and institutional parcels to allow for more residential units per parcel. Please check all that apply.

"The qualitative responses mirror the quantitative data. The majority of respondents expressed strong concerns about ensuring sufficiency of water and sewage disposal and concerns about density increases."

# Even though the majority of respondents expressed concerns about water, sewage and density increases there are no comments quoted about density increases or concerns with water and sewage, only those comments that favour allowing increases.

Conclusions: Questions 2/3:

"Support for allowing an increased number of residential units in commercial or institutional zoned properties is conditional on water and an assurance that the units will remain as rental units with affordability guaranteed."

## The majority of concerns were about water and sewage and density increases as stated, yet sewage and density increases aren't mentioned in the conclusion.

**Q4:** Should the LTC consider looking at more flexible residential zoning regulations to allow for increased densities on a parcel under certain conditions?

"Questions 4 and 5 examine the potential for more flexible zoning to accommodate changing family needs (e.g., the need for an onsite caregiver, or

accommodation for extended family) thereby allowing additional density on a parcel but with restrictions to floor areas and lot coverage being equal to or less than what is allowed for one traditional-sized, single-family dwelling."

### To limit the floor area to equal to or less than what is allowed is irrelevant since there is no restriction on floor areas for a single-family dwelling.

#### Conclusions: Questions 4/5

"A bare majority of respondents (54%) unconditionally support flexible zoning in residential zones, and an additional 22% are undecided. As with other options a primary concern is water and sewage adequacy and the impact on the environment, especially trees. The size of dwellings and lot coverage are also important, especially for owners. There appears to have been some confusion as to whether 'flex' zoning would result in increased densities."

This is a misrepresentation. It cannot be said that 54% (53% according to Chart 10) unconditionally support flexible zoning when the question includes the words "<u>under certain conditions</u>".

53% supported allowing with restrictions to floor areas and lot coverage <u>for each dwelling</u>. 25% said no and 22% said maybe. Those who do not support this option (25%) and those that are uncertain (22%) could be grouped together (47%). A small majority support this with conditions.

**Q5:** If you answered Yes or Maybe to Question 4, please indicate the conditions under which you would support more flexible zoning for residential parcels to allow for more residential units per parcel. Please check all that apply.

# Question 4 asks if there is support for flexible zoning to allow increased density ON A PARCEL under certain conditions. In Question 5 this seems to have changed to support for changing regulations on entire zones to allow this for all such zoned residential parcels. It is unclear what is meant.

Preamble to Question 6:

"Currently there is the potential to create an additional 158 lots through subdivision. If fully built-out and occupied year-round this would increase the population by about 300".

### This doesn't include the secondary suites allowed on each of these lots making the increase in density 600 persons, not 300.

**Q6:** Please rate the following options for ensuring managed growth.

a) Maintaining existing zoning and subdivision regulations

"As shown in Chart 12, when the options Strongly Support and Support are combined, the option with the highest support is "develop new subdivision policies and regulations to include proof of potable water requirements that exceed the provincial requirement & include requirements for water storage" (73%). This is followed by the option to "develop new subdivision policies and zoning regulations to reduce the potential for small residential lot creation" (58%)."

"The other two options both scored 50% or under: "require that new subdivision policies and regulations to restrict the maximum subdivision potential unless a percentage of lots in each subdivision

are protected with a housing agreement to ensure affordability at time of sale and re-sale in perpetuity" (50%); and, "maintain existing zoning and subdivision regulations" (43%)."

### Chart 12 is titled Preferred Options for Managing Growth but the question asks respondents to "rate the following options". I took this to mean to rate in terms of effectiveness not in terms of preference.

"The comments also mirror the nearly even distribution between those who want no change and those who feel some change is required."

I disagree that this is what the data represents. There is no choice between wanting no change or some change. The question asked respondents to rate different options for managing growth. 43% of respondents agree that encouraging the LTC to maintain existing zoning and subdivision regulations is a way to manage growth. 37% disagree and 20% are not sure.

This presentation of the data suggests that those who support new policies and regulations far outnumber those who want to maintain the existing regulations. There is strong support for increasing water requirements but it is not instead of maintaining the status quo. Only 37% are opposed to maintaining the status quo, the 73% who want higher water requirements must include some of the those who agree with the status quo or who are unsure. All but the first option refers to "new policies and regulations" and not to changes in policy. That a higher percentage of respondents agree the other options are effective reflects an overlap and some of the 43% who believe the existing regulations should be maintained also believe "new subdivision policies and regulations" would be effective. These are not mutually exclusion.

#### **Conclusions: Question 6**

"There is comparatively little support for maintaining the status quo policy framework around managing growth. Instead, there is strong support for policies addressing water conservation and protection. As well, there is support for limiting the potential for the creation of small lots through subdivision. And although requiring provision of affordable housing as part of subdivision application received less support than the previous two options, almost 52% of respondents support this option."

This is a gross misinterpretation of the results. No matter how you cut it, 43% of respondents agree the existing zoning and subdivision regulations would ensure managed growth. That is not "comparatively little support". Even though 43% support the status quo, 2 of the comments quoted favour a change to the status quo and the third speaks to the 1% of respondents in unsafe housing.

**Q8:** Are you supportive of maintaining the current regulations that could result in maximum build-out?

This is the most direct question about population density and it is based on incomplete information as previously noted. One of the options is: "No, I would support changes in the regulations to permit an increase in the projected population." The potential build-out number is incorrect and is in fact much higher than reported here. How can we know respondents wouldn't have answered differently had they known the population build-out was that much higher?

"53% of respondents support changes in regulation that would result in a decrease in population. 23% support maintaining the current regulations that could result in full build out. A slightly larger percentage (24%) support changes in regulations to permit an increase in the projected population."

# Expressing the data in this way leaves the reader with the impression that a larger percentage support changes to permit an increase in density when only 24% support changes to permit an increase in projected population.

**Q9:** If you answered No to question 8, what regulations do you recommend the LTC review to manage growth and/or the impacts of growth? Please check all that apply.

"The three strategies for managing growth that received more than 50% support are: establishing minimum lot sizes for subdivisions (57%); establishing secondary suite regulations (54%); and requiring the inclusion of affordable housing (supported by a housing agreement) as part of subdivisions (52%). Two other options garnered less than 50% support: requiring that donation of densities to the Density Bank be used for the development of affordable housing (43%); and establishing floor area limits for dwellings (42%)."

There are 2 options for a "no" response in Question 8. One if you support increases in the population and one if you support decreases in the population. Because the question doesn't specify which it refers to it's impossible to know what the intent of the respondent is in answering the questions. Did they respond because they support decreases in potential population and see the choices offered as being used to decrease the population e.g. Minimum lot sizes for subdivision, less secondary suites allowed, floor area limits?

Or are they choosing these options as ways increases in potential population might be managed. In all 3 surveys this question got the lowest number of responses (204). Given the lack of clarity nothing decisive can be deduced with any certainty from this question. In addition, 134 persons (40%) of respondents to the survey skipped this question.

#### Conclusions: Questions 8/9

"As Question 8 responses show, Gabriolans are split on the question of growth. Slightly over half of Gabriolans surveyed are supportive of degrowth strategies. Almost half support either the status quo approach (23%) or implementing regulations that would increase growth (24%)."

This does not show that Gabriolans are split in half on the question of growth. 76% want the density potential to remain the same or decrease. It's misleading to group opposite viewpoints together; those who support the status quo with those who don't. The grouping should be those who support the existing regulations and those who want a decrease in the potential population. 76% support the current regulations or want decreases in the potential population and 24% support increases in the potential population.

**Q10:** What is your current source of freshwater? Please check all that apply. **Q11**: If you purchase bulk water, do you source your bulk water on island or off-island?

#### Conclusions: Questions 10/11

"What these data do not tell us is what combination of resources individual households use (e.g., only wells, or wells and rainwater collection). It appears that most people who bought water in bulk do so from on-island sources although it is not clear whether people are also including large refillable bottles

of drinking water in the bulk water category, especially in question 11, given that about double the number of respondents answered question 11 than did those who indicated they purchased bulk water in question 10."

# If respondents included bottles of drinking water in Question 11 it skews the results to show that more people buy their bulk water on-island. We would have to assume that the percentage of those who buy bulk water (excluding bottled water) off island is higher than the data shows.

#### Conclusions: Questions 12/13

"Freshwater conservation has been a constant theme throughout the three surveys and a majority of Gabriolans depend on well water or a combination of well water, rainwater collection and bulk water purchases for both potable and non-potable needs. It is important to note that over 80% of respondents indicated they would consider installing a rainwater collection and storage system."

To say "a majority of Gabriolans depend on well water or a combination of well water, rainwater collection and bulk water" is meaningless and does not reflect the data or the conclusion to Question 10: "The predominant source of water is wells followed by rainwater. Bulk water sales do not appear to be a significant source of water."