

APC SUPPLEMENTARY REPORT

MARCH 23, 2026

OVERVIEW:

The APC “Final Report” to the NP LTC was prepared in November 2025 prior to receipt of the Build Out and Land Suitability Analyses. The recommendations provided in that report were subject to revision when the Build Out and Suitability Analyses were available. The APC received these reports in January 2026 and additionally received the Islands Trust – Housing Needs Assessment 2025 in February 2026. Review of these documents has resulted in revision of our recommendations.

This Supplementary Report updates our recommendations regarding Goal Four of the Housing Action Plan, using newly available data in accordance with Goal One.

As detailed in the analysis below, upon reviewing the North Pender Island Build Out and Suitable Land Analyses, the APC concludes that there is already sufficient build out potential on North Pender Island without adding any secondary suites or ADUs. Simply building cottages in the R zones, already zoned for 573 such dwellings, could create almost enough housing to fulfill the current estimate of 643 units needed in the next 20 years as shown in the Gulf Islands Housing Study commissioned by the CRD to meet the requirements of the British Columbia Housing Needs Assessment regulations, using the methodology provided by the Province in the summer of 2024.

<https://islandstrust.bc.ca/document/islands-trust-housing-needs-assessment-2025/>

The present population density of North Pender Island is 90.5 per square kilometer, by far the highest of any of the Gulf Islands. Full build out under the already existing Official Community Plan and Land Use Bylaw 224 as demonstrated by the Build Out Analysis could increase our population by over 6000 tripling the population to 9000 or more, resulting in a density over 300 per square kilometer. Clearly this density is beyond what the Island can sustainably support and is inconsistent with the preserve and protect mandate of the *Islands Trust Act*.

More than two thirds of this potential population increase is a result of the decision in 2018 to amend the zoning to allow for secondary suites in all island residences including those in Magic Lake Estates. This singular decision added 2070 potential secondary suites to the Pender Island community and with a two person occupancy average results in a potential increase in population of 4140.

The APC regrets this decision as it believes that, if unrestrained, this restricts the ability to add density elsewhere for an increased variety of housing options in line with the goals of the Housing Action Plan. Measures to control the introduction of secondary suites, most importantly those in Magic Lake, would create room for new options for affordable housing on lots outside of Magic Lake.

As noted, over half of this potential population increase results from unrestricted zoning for secondary suites in Magic Lake. It is now suggested that since the zoning already exists for secondary suites adding ADUs as an alternative would not increase density. This ignores the potential impact on population growth and density that the zoning for secondary suites in Magic Lake has already created.

While the infrastructure in Magic Lake does not currently exist to support such an increase, November 2025 staff report suggests that zoning for ADUs should precede the development of the infrastructure to support them. It is further suggested that Magic Lake should expand the existing infrastructure to support the current zoning for secondary suites or the proposed zoning to allow ADUs as an alternative. The striking irony here is that this viewpoint overlooks the fact that the existing population density of Magic Lake, before the 2018 zoning for secondary suites was even put in place, was considered **unacceptable** resulting in the creation of the Islands Trust Preserve and Protect Mandate in 1974.

The current full-time population of Magic Lake is estimated to be between 1500 and 2000 and the area is approximately 2.45 square kilometers. As a result, the current population density of Magic Lake is already between 650-800 per square kilometer. That could more than double to 1300- 1600 if the infrastructure were in place to support the build out of all potential secondary suites or ADUs. The APC considers such potential unlimited expansion to be unreasonable, unsustainable and inconsistent with the preserve and protect mandate of the *Islands Trust Act*.

With this better understanding of the impact of zoning for secondary suites or ADUs on possible future population growth the APC recommends that the North Pender Trust Committee limit the zoning for ADUs as an alternative to secondary suits to lots between less than 1.2 hectares on 10 on RR1 lots and 90 on RR2 lots and also cap the construction of secondary suites to 100 to ensure that future population growth is maintained in accordance with the preserve and protect mandate of the *Islands Trust Act*. The APC further recommends that no ADUs be allowed on R, RC1 and RC2 lots and that secondary suites on these lots be capped at 25.

With existing bylaws, the Build Out Analysis indicates that there is potential for 573 new cottages on North Pender. Thus, there is already ample potential for relatively modest market housing that is not being realized. In addition, there is the potential for more than 2000 secondary suites and there are 199 additional lots that could be created by subdivision. The lack of take up of this potential is not limited by the Official Community Plan or zoning but rather by the factors which are outside the control of the Islands Trust (e.g. high construction costs, risks to landlords associated with long-term tenancy). This logic is well articulated by the Salt Spring Island Positively Forward website at: <https://positivelyforward.ca/affordable-housing/> . While the current potential for secondary suites exceeds 2000 the APC understands that to date only 6 have been constructed. Placing reasonable limits on their number over the next five years should not inhibit the construction of such dwelling units.

The previous flexible housing APC recommendations in the November 2025 Report have been incorporated into the draft bylaws which are being prepared by staff for consideration at the April 2026 NP LTC meeting. However, it is now apparent to the APC that implementation of these recommendations could create the potential for a population of 11, 700 which would result in a density of 400 per sq. kilometer approaching that of greater Victoria. Such an increase would severely compromise the natural environment of the island, is unsustainable and is untenable under the **Preserve and Protect Mandate** which animates the Islands Trust.

Given this new information and understanding the APC has reconsidered some of the preliminary recommendations for OCP and LUB changes relating to Goal 4, the Flexible Zoning proposal which was based on the Mayne Island template. What might be suitable for Mayne Island is clearly unsuitable for North Pender Island. Further, reasonable limits on both the number of secondary suites and ADUs which could be constructed over the next five years is recommended to ensure that sustainable growth consistent with the mandate of the *Islands Trust Act* takes place.

The recommendation for a cap of 100 ADUs overall as an alternative to Secondary Suites and a cap of 10 ADUs in RR1 is consistent with the estimate of the next 5 years of housing need for North Pender Island identified in the Islands Trust - Housing Needs Assessment 2025.

GOAL 4: Expand opportunities to create secondary suites and permit Accessory Dwelling Units (ADU).

OPTIONS

- 1. a. Allow 100 ADUs as an alternative to secondary suites on lots smaller than 1.2 hectares (3 acres), with a Cap of 10 secondary suites or ADUs in the RR1 zone and 90 secondary suites or ADUs in the RR2, R, RC1 and RC2 zones on lots under 1.2 hectares; and
 - b. Cap the total number of secondary suites on lots over 1.2 hectares in the RR1, RR2, R, RC1 and RC2 zones to 25.

- 2. Allow ADUs as an alternative to secondary suites in lots greater than 0.4 hectares (1 acre) and less than 1.2 hectares (3 acres) in the RR2, R, RC1 and RC2 zones; and
 - b. Allow up to 10 ADUs as an alternative to secondary suites in the RR1 zone.

3. Allow up to 5 ADUs as an alternative to secondary suites in the AG zone, 6 in the R zone, 10 in the RC1 zone, 10 in the R 2 zone zone, 10 in the RR2 zone and 10 in the RR1 zone.
4. Do nothing

Tables showing the potential population increase for each of these options are appended.

ANALYSIS

The following information in the North Pender Island Build Out and Suitable Land Analyses and Islands Trust – Housing Needs Assessment 2025, inform the APCs revised recommendations regarding flexible housing.

- With existing Zoning there are 299 vacant lots that could be developed and another 199 that could be added by subdivision as well as 2070 potential secondary suites and 593 potential cottages. Thus, a potential for 3161 extra households! If this build out potential was realized, and we assume 2 persons per household, it would mean the population of North Pender could increase by more than 6000 people. The present population is 2700 which represents the highest population density on the Southern Gulf Islands. (90.5/sq km versus 63 on Salt Spring Island 62 on Mayne 23 on Galiano and 15 on Saturna).
- If our suggested Flexible Zoning Bylaw contained in the November Report was passed the capacity for dwellings and the density would be unacceptably increased.
- In the November 2025 recommendations the 509 RR2 lots (existing + sub-divisible) could add one, two or 3 dwellings depending on lot size (ADUs or secondary suites). If we assume 50% could accommodate 1 more dwelling, 35% 2 more dwellings and 15% 3 more dwellings this brings the increase in potential dwellings to $(0.5 \times 509 \times 1 + 0.35 \times 509 \times 2 + 0.15 \times 509 \times 3) = 840$ additional potential dwellings. Again, assuming 2 persons per dwelling an additional 1680 people leads to a potential population growth of **7680**.
- Also in the November 2025 recommendations the 297 Rural lots (existing + sub-divisible) could add one, two or 3 dwellings depending on lot size (ADUs or secondary suites). If we assume 50% can accommodate 3 more dwellings, 35% 2 more dwellings and 15% 1 more dwellings this brings the increase in potential dwellings to $(0.5 \times 297 \times 3 + 0.35 \times 297 \times 2 + 0.15 \times 297 \times 1) = 698$ additional potential dwellings. Again, assuming 2 persons per dwelling this leads to an additional 1397 people leading to a potential additional population of **9,076**.

- The existing population of 2700 +9000 yields a potential of **11,700** - a population density of ~400/ square km. The population density of greater Victoria is 570.
- This analysis does not consider the potential increased dwellings proposed for worker accommodation or the proposed increase in zoning for affordable and multi-unit housing.
- Simply on the basis of the availability of freshwater as demonstrated in the Suitability Analysis it is clear that the Trust’s mandate should be to explore how to limit the potential for over development while facilitating the need for a relatively small number of low-cost market housing and below market subsidized housing.
- The Gulf Islands Housing Needs Assessment -2025 estimates that the five year need for increased housing units is 208 and the 20 year need is for 643 dwelling units, a growth of 16% over the next five years and 50% over the next twenty years. This would result in a population density of approximately 150 per square kilometer after 20 years. The current zoning allows for growth of more than 300% which far exceeds these assumptions.
- What is clearly needed is not an expansion of secondary suites but a reasonable limit on the potential build out of secondary suites, to ensure the sustainable growth of such units over the next five years while providing the flexibility to add other options for affordable housing.
- Limited expansion of ADUs as an alternative to secondary suites is similarly necessary to preserve the suite of zoning options to facilitate the construction of affordable housing.

RECOMMENDATION

Option One:

1. a. Allow 100 ADUs as an alternative to secondary suites on lots smaller than 1.2 hectares (3 acres), with a Cap of 10 secondary suites or ADUs in the RR1 zone and 90 secondary suites or ADUs in the RR2, R, RC1 and RC2 zones on lots of this size; and
 - b. Cap the total number of secondary suites on lots over 1.2 hectares (3 acres) in the RR1, RR2, R, RC1 and RC2 zones to 25.

The increase in density contemplated in the November 2025 APC report submitted to the LTC prior to receipt of the build out and suitability analyses is clearly untenable as is the population increase that would occur if the current zoning was fully built out. See Appendix A Table Option Four.

A limit to the current zoning to ensure a reasonable growth rate while providing flexibility for affordable housing options is needed. This will allow for a full Carrying Capacity Study to be carried out prior to the next mandatory 5-year review of the OCP and Bylaws.

To provide further flexibility on lots smaller than 3 acres (1.6 hectares) in the RR1 and RR2 zones, zoning could allow for 100 ADUs of up to 650 sq. ft. **as an alternative to secondary suites** with a cap on the number of ADUs on RR1 Lots of 10 and RR2, R, RC1 and RC2 lots of 90.

The APC further recommends limiting the creation of secondary suits in the RR1, RR2 R, RC1 and RC2 zones on lots over 1.2 hectares to 25.

Lots over 3 acres already allow for the construction of a cottage of up to 850 sq. ft. so the APC considers it unnecessary to further increase density by adding an ADU as well to these properties,

These limits leave room for the implementation of the other options to increase the availability for employee, not for profit and affordable housing recommend by the APC in the November 2025 report.

Given the data in the Build Out and Suitability Analyses the focus of the LTC should be on Action Items 5 (Multiunit Development), 7 (Worker Accommodation) , and 8 (Small Footprint Homes) to zone specific properties on suitable land to enable relatively low market and affordable housing, such as a clustered village of small homes, worker housing, and subsidized below market housing which could include multiplex construction as contemplated in the November Report and the Draft OCP and Bylaw.

The APC also encourages the NP LTC to consider facilitating site specific, targeted opportunities for affordable multiplex projects as they may arise.

Appendix A, Goal Four, Option Tables
OPTION FOUR - DO NOTHING
 Current Table from Buildout Analysis - Feb 2026

Zone (Includes Site Specific)	Existing Developed Parcels	Existing Vacant Parcels	Total Existing Parcels	Potential Additional Parcels by Subdivision	Total Potential Residential Parcels	Total Potential Dwellings	Total Potential Secondary Suites Adopted 2018	Total Potential Cottages
AG	35	1	36	0	36	36	35	31
CH	1	0	1	0	1	14	0	0
R	196	53	249	48	297	297	297	224
RC1	16	10	26	0	26	26	26	20
RC2	0	2	2	8	10	10	0	0
RR1	1,137	171	1,308	3	1,311	1,311	1,205	1
RR2	316	52	368	140	508	509	507	297
TOTAL	1,701	289	1,990	199	2,189	2,203	2,070	573
Occupants - Average					2	4,406	4,140	1,146
								9,692

Existing Population Potential

OPTION ONE

Zone (Includes Site Specific)	Existing Developed Parcels	Existing Vacant Parcels	Total Existing Parcels	Potential Additional Parcels by Subdivision	Total Potential Residential Parcels	Total Potential Dwellings	Total Potential Secondary Suites or ADUs (0.6 - 1.2 hectares)	Total Potential Cottages
AG	35	1	36	0	36	36		31
CH - Plum Tree	1	0	1	0	1	14		0
CH - Anglican Church Other						unknown		
Worker Housing Cluster Units								
Multiplex Units								
R	196	53	249	48	297	297		224
RC1	16	10	26	0	26	26		20
RC2	0	2	2	8	10	10		0
RR1	1,137	171	1,308	3	1,311	1,311		1
RR2	316	52	368	140	508	509		297
TOTAL	1,701	289	1,990	199	2,189	2,203	125	573
Occupants - Average					2	4,406	250	1,146
								5,802

Revised Population Potential

OPTION TWO

Zone (Includes Site Specific)	Existing Developed Parcels	Existing Vacant Parcels	Total Existing Parcels	Potential Additional Parcels by Subdivision	Total Potential Residential Parcels	Total Potential Dwellings	Total Potential Secondary Suites or ADUs (0.6 - 1.2 hectares)	Total Potential Cottages
AG	35	1	36	0	36	36	6	31
CH - Plum Tree	1	0	1	0	1	14		0
CH - Anglican Church Other						unknown		
Worker Housing								
Cluster Units								
Multiplex Units								
R	196	53	249	48	297	297	73	224
RC1	16	10	26	0	26	26	6	20
RC2	0	2	2	8	10	10	10	0
RR1	1,137	171	1,308	3	1,311	1,311	10	1
RR2	316	52	368	140	508	509	212	297
TOTAL	1,701	289	1,990	199	2,189	2,203	317	573
Occupants - Average						2	2	2
						4,406	634	1,146

Revised Population Potential

OPTION THREE

Zone (Includes Site Specific)	Existing Developed Parcels	Existing Vacant Parcels	Total Existing Parcels	Potential Additional Parcels by Subdivision	Total Potential Residential Parcels	Total Potential Dwellings	Total Potential Secondary Suites or ADUs (0.6 - 1.2 hectares)	Total Potential Cottages
AG	35	1	36	0	36	36	5	31
CH - Plum Tree	1	0	1	0	1	14		0
CH - Anglican Church Other						unknown		
Worker Housing								
Cluster Units								
Multiplex Units								
R	196	53	249	48	297	297	10	224
RC1	16	10	26	0	26	26	6	20
RC2	0	2	2	8	10	10	10	0
RR1	1,137	171	1,308	3	1,311	1,311	10	1
RR2	316	52	368	140	508	509	10	297
TOTAL	1,701	289	1,990	199	2,189	2,203	51	573
Occupants - Average						2	2	2
						4,406	102	1,146

Revised Population Potential