

# Denman Island Housing Action Plan (Draft) - May 2024

## Introduction

Denman Island is experiencing a crisis of housing affordability and availability that has already caused many residents to leave the community. Over the decades, land use regulations on Denman Island created housing stock that is almost exclusively composed of single family dwellings. With limited rental stock and rising purchase prices, accessing housing on Denman Island has become less accessible for those who do not already own property.

The limited housing options on Denman Island have been a prominent topic of discussion for over 20 years. In that time, numerous studies have been undertaken to understand housing need. Work undertaken by the Housing Advisory Planning Commission (HAPC) in Winter 2024 as a part of the Denman Island's Housing Review Project identified a suite of land use planning measures, tools, and advocacy opportunities geared toward increasing housing options and legalizing existing living situations where appropriate while preserving and protecting the natural environment.

This Action Plan identifies objectives and provides corresponding policy, regulatory, and strategic measures aligned with eight overarching goals emerging from the Denman Island HAPC 2024 report and other input provided to and supported by the Denman Local Trust Committee (LTC) to date. The Draft Housing Action Implementation List, a key part of the Housing Action Plan, provides a framework for monitoring implementation progress on options that the LTC has identified support for, with the flexibility for updates as needed. The land use-focused actions identified in this plan are the main focus of the Denman Island Housing Review Project.

This Action Plan serves as a plan for implementing measures and strategies to address the housing challenge on Denman Island within the framework of the Denman Island Housing Review Stage 2, Phase 2 (2023-2025). It also offers a comprehensive tracking and monitoring mechanism and serves as a succinct representation for community members, non-profit housing groups, Comox Valley Regional District (CVRD) and senior government, illustrating the focal points of housing-related actions providing insights into potential areas of involvement and collaboration.

## Goals and Objectives

### Goal 1: Update Information to Inform Housing Projects

The collection of information that may inform housing projects on Denman Island now and into the future are in process. The extent to which this information is used to inform housing projects on the Island is a Local Trust Committee (LTC) decision. Related objectives are as follows:

**Update Housing Needs Information:** Updating housing needs assessments every five years is now a requirement of the Provincial Government. The Province provided the Islands Trust with funding to do this work in 2024. This work will begin once the Province has provided direction on the required content of housing needs assessments. This work will be managed by a member of the Islands Trust Regional Planning team and will not impact the timing of Denman's Housing Review Project.

**Use Suitable Land Analysis:** Integrating diverse data sources, this mapping tool aids the LTC in making informed decisions regarding density increases, considering factors such as environmental protection, fire safety, water recharge, saltwater intrusion and terrain suitability. Water Balance assessment data and other data can be added to the suitable land analysis, when available. The LTC can determine the existing data they would like to use and the weight of that data to inform decision making related to increasing the density and intensity of land use.

## Goal 2: Incorporate First Nations Interests in Land Use Decision Making

Working with the K'omoks, and other First Nations, on all projects related to increasing density and intensity of land use is an important step forward with respect to reconciliation. This work is also anticipated to help facilitate efficient review and approval of OCP amendments by the Province. One key objective related to this goal is to:

**Foster Early and Respectful First Nations Engagement:** Proactive engagement with First Nations is essential for effective collaboration and reconciliation. Initiated by staff and supported by the LTC's approval of funding and a capacity agreement, this engagement process aims to produce a comprehensive report by Spring 2025, aligning with provincial expectations for meaningful Indigenous consultation.

## Goal 3: Diversify Housing Options – Land-Use

Increasing housing options has been identified by the Denman HAPC and the LTC as a key focus for increasing housing access and affordability on Denman Island. This is a key focus of Denman Island's Housing Review process. Related objectives include:

**Streamline Land-Use Regulations :** Actions related to this objective include removing temporary use permit (TUP) requirements for accessory dwelling units (ADUs) and making changes to OCP policy and land use regulations to increase flexibility in type of house. As well as facilitate easier access to donated land for not for profit and government organizations.

**Expand Housing Options:** Actions related to this objective include a variety of options such as permitting alternative dwelling types and expanding permission for secondary suites and accessory dwelling units. Expanding permissions for multiple accessory dwelling units within a maximum floor area or in exchange for land preserve is also include in the list of actions.

## Goal 4: Minimize Environmental Impact on Land – Land-Use

The preservation and protection of the environment is a core value of the Islands Trust and something that is well respected by the Denman Island community. The Housing Action Plan includes actions identified by the HAPC that support environmental interests. The use of suitable land analysis to identify areas where development may have higher impact on environmental protection will also help inform decisions related to minimizing environmental impact. Related objectives include:

**Utilize Available Data for Informed Decision Making:** Suitable land analysis provides the opportunity to use all available data related to environmental interests to identify areas that are more or less suitable for additional density from an environmental impacts perspective. This analysis can be complemented by/complement local knowledge.

**Protect and Preserve Ecosystems and Freshwater Resources:** Cistern requirements for new builds are one option identified to reduce the draw on freshwater resources. Reducing lot coverage and considering the suitability of land from an ecological and freshwater sustainability perspective will help contribute to protecting groundwater recharge as well as protecting other ecological values.

## Goal 5: Implement Affordability Measures – Affordability Controls

"Ensuring affordability" is a key interest of the APC. Given that the Local Trust Committee's jurisdiction is limited to land use, ensuring affordability is a challenging task for the LTC. Housing agreements are one land use planning tool available to ensure affordability over time. In the Islands Trust Area, this tool is primarily used to ensure affordability with multi-family developments owned by not-for-profit organizations. Expanding the use of housing agreements to single units

owned by private property owners will require the Islands Trust and/or the Comox Valley Regional District (CVRD) to consider administrative support needs. Related advocacy policies can be included in the OCP. A related objective identified by the HAPC is:

**Allow Additional Units in Exchange for a Community Amenity (Affordable Housing of Conservation of Land):** Denman Island has already used a “density bonus” approach in 2008 where 505.3 hectares of land was protected in exchange for 31 units. This approach could be explored for smaller lots. Policies can be created to allow additional units if they are rented affordably. However, administrative support is required to ensure that the units are rented affordably over time.

#### Goal 6: Address Bylaw Enforcement Issues Related to Housing

Islands Trust Council has directed the Regional Planning Committee to review the recommendations of the Ombudsperson’s Report on Bylaw Enforcement Policies and Practices and recommend amendments to policies. For specific local issues, the LTC could meet with bylaw staff to discuss options. Related objective:

**Bylaw Enforcement on Housing Related Matters is Appropriate:** In addition to the work being done at the Islands Trust Wide level, the Denman LTC, at their November 14, 2023 LTC meeting, requested regular reporting from the Bylaw Compliance & Enforcement Manager so that the Local Trust Committee can review and prioritize enforcement and enforcement resources.

#### Goal 7: Provide Education and Engagement on Building Costs/Options/Environmental Alternatives

Education and engagement actions are outside the scope of land use project work. However, they have been included in Denman Island’s Housing Action Plan as they could be addressed at the LTC level as a minor project, or at the Trust Wide level and/or in cooperation with the CVRD. Related advocacy policies can be added to the OCP. Related Objective:

**Educational Resources Related to Housing Costs and Alternatives Available to Community:** The kind of information identified by the HAPC to be useful to the community include: information on building costs, water capture, and alternative building options.

#### Goal 8: Advocate for Support for Infrastructure Needs

This goal recognizes that the housing needs on Denman Island cannot be fully supported through land use changes only. Affordability of housing is tied to the cost of water access (wells and rainwater catchment) and sewage disposal (septic system) in addition to the costs to build. The OCP can include advocacy policies to support the following objectives:

**Secure Financial and Policy Support for Water Access and Septic System Development** – This includes financial support for cistern purchase and septic installation or expansion of regional water and sewage services as well as policy support for alternative systems such as greywater recycling and small water system sharing.

**Secure Financial Support to Build Housing:** Advocacy related to this can be directed to the Islands Trust to take on a broader advocacy role. Advocacy can also be directed to the agencies that have sources of funding that could be directed toward the supporting housing for Denman Island.

## Attachment 4: Draft Denman Island Housing Action Implementation Plan

Blue – Items Part of Denman Housing Review Stage 2, Phase 2

Green – Items being done at Trust Wide level or require collaboration with CVRD or Province

I – Information

M – Minor Project

P – Phase 2

IT – Islands Trust Responsibility

BL – Bylaw Enforcement

ED – Education

ACTION		Status	Anticipated Timing
<b>Goal 1: Update information to Inform housing project - INFORMATION</b>			
I1	Update Housing Needs Assessment	To be done as part of IT project	TBD once Provincial direction is provided
I2	Water Balance Assessment	Waiting for funding allocation	2025/26 fiscal
I3	Workshop with LTC on Suitable Land Analysis (SLA)	To be Scheduled	June – August 2024
<b>Goal 2: Incorporate First Nations Interests in Land use Decision Making – RECONCILIATION</b>			
P2A,P2B, P2C	Identify FN Interests with respect to housing options and impacts	Capacity Agreement and funding in place	ongoing
<b>Goal 3: Diversifying Housing Options – LAND-USE</b>			
M1	Remove TUP requirement for ADUs	Minor Project	Bylaws fall 2024
M1?	Eliminate or update Density Bank	Minor Project ( )?	TBD
P2A	Reformatting Land Use Bylaw Regulations	Required	Summer 2024
P2A	Review LUB definitions to ensure consistency with OCP	IT standards being created	
P2A	Review existing site specific exemptions in light of TUP changes	Technical change	Summer 2024 – primary work (exploring questions that might arise, public engagement as required, FN engagement, bylaw drafting)
P2A	Permit Dwelling units in community service zone	Explore options	
P2A	Consistency with ALC regulations	Technical change	
P2A	Permit Alternative Types of units (RVs, Yurts etc.)	Technical change	
P2A	Legalize housing on a site specific basis	*At May7 meeting, LTC suggested this become a separate project	
P2A	Make existing multi-family zoning more flexible	Technical change	
P2A	Limiting Vacation Rental Permission to BnB	Tech change related to legal review	
P2A	Expand secondary suite permissions into water service areas	Requiring connecting with CVRD	
P2B	Include policies related to ALR exclusion for affordable housing	Technical change, engagement related to conditions recommended	
P2B	Permit reduction of min parcel size to facilitate land for donation to NGO/Govt	*At May 7, 2024 meeting LTC suggested these be removed	
P2B	Permit subdivision (where not currently permitted) in exchange for donation		
P2B	Allow subdivision only if land is donated for affordable housing		
P2B	Add policies to support development variance for proof of water for cooperatives	Dependent on review of existing	
P2B	OCP Policies to support home based assisted living and tiny home villages	Technical change	
P2B	Allow for variations in housing that support shared facilities (e.g. podhouse)	Technical change to support existing?	
P2C	Expansion of Accessory Dwellings Unit permission	SLA and early FN engagement recommended	Summer 2024 -SLA
P2C	Expansion of Secondary Suite Permission (SLA) beyond water service areas	SLA and early FN engagement recommended	Fall/winter 2024 – preliminary work ,

P2C	Allow Multiple Dwelling Units with Max Combined floor area (Flexible Housing)	SLA and early FN engagement recommended;  *At May 7,2024 meeting LTC requested tiny homes be considered	amendment option can be drafted before locations identified  FN engagement ongoing
P2C	Additional dwelling units if land is conserved/housing agreement is in place	SLA and early FN engagement recommended;	Bylaws 2025
IT1	Expedite Approvals for multi –unit housing rezoning applications	To be done at Trust Wide level as part of Trust Wide Housing Action Plan Implementation	TBD
<b>Goal 4- Minimize the Environmental Impact on Land –LAND-USE</b>			
P2C	Use suitable land analysis to identify areas more suitable for additional density	Suitable land analysis if in process	Summer/Fall 2024
P2C	Implement maximum combined floor area for multiple dwellings	Maximum combined floor area (MCFA) to be discussed, staff to provide options	Fall 2024 – MCFA to be identified
P2A	Reduce lot coverage ( to include floor area and impervious surfaces)	Maximum combined floor area to be discussed.	Summer/Fall – draft bylaws
P2A	Cistern requirement for new builds	Cistern size to be discussed, staff to provide options	
<b>Goal 5 – Implement Affordability Measures – AFFORDABILITY CONTROLS</b>			
IT2	Allow additional units if they are being rented affordably	The only way to guarantee affordability into the long-term is through housing agreement. Requires increasing administration of HAs by the Islands Trust or CVRD developing administrative function.	TBD  Fall 2024 -Can be included as advocacy policy
<b>Goal 6 – Address Bylaw Enforcement Issues Related to Housing –BYLAW ENFORCEMENT</b>			
BL1	Identify challenges and options to address	Trust Council Bylaw Enforcement Review currently underway	TBD
<b>Goal 7 – Provide Education and Engagement on costs/options/environmental alternatives -EDUCATION</b>			
ED1	Education re: costs to build, water capture and other alternatives	This could be done on a Trust Wide basis, CVRD or as a LTC minor project.	Fall 2024- Can be included as advocacy policy
ED2	Identify opportunities for CVRD to develop education materials	Meet with the CVRD to advance action plan	Fall 2024- Can be included as advocacy policy, meeting with CVRD
<b>Goal 8 – Advocate for Support for Infrastructure Needs – ADVOCACY</b>			
ED1	CVRD expansion of water and sewage services	Meetings with CVRD required	Fall 2024- Can be included as advocacy policy, meeting with CVRD
ED2	Advocate for support for Cistern purchase	Meeting with CVRD and Province required	Fall 2024- Can be included as advocacy policy, meeting with CVRD
ED3	Advocate for Municipal and Regional District Tax (MRDT) to be collected to support affordable housing development	Meeting with CVRD required	
ED4	Advocate to province for additional revenue to support housing	Item in Trust wide Housing Action Plan	Fall 2024- Can be included as advocacy policy
ED5	Advocate to Island Health to support waste disposal alternatives	Item in Trust wide Housing Action Plan	
ED6	Advocate to Province re: small water system sharing	Could be included in Trust wide Housing Strategy Action Plan	TBD re: advancing action