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Date: May 22, 2024 at 10:24:24 PM PDT

To: Jeanine Dodds <jdodds@islandstrust.bc.ca>

Cc: David Maude <dmaude@islandstrust.bc.ca>, n.chadwick@islandstrust.bc.ca

Subject: MA BL 193: Mayne Island - Church Lot Rezoning from Seniors to include Multi-Family Affordable Housing and Proposed Increase from 8 Seniors Duplexes to 16 Dwelling Units

Trustees Dodds and Maude, I understand that Islands Trust will be meeting on Monday May 27, 2024 to review and potentially approve first and second reading of the above flawed bylaw. My information below will provide evidence that you have a Statutory Requirement not to proceed with any reading of this bylaw and as members of the LTC you have an obligation to when appropriate schedule a Community Information Meeting once you have conducted the necessary research and have some more evidence based information about the actual consequences of this rezoning proposal as written and the ambiguous site density which is never addresses or described.

Please accept this email as my objection to any reading of this bylaw as written and the suggestion that this bylaw only introduces “minor” changes and therefore no Community Information Meeting should occur. **This new bylaw is not a minor change. It could, as written, potentially almost double the number of people permitted to live in housing on Church property. This was never considered or allowed for by the original planners. A change from eight duplexes exclusively for Seniors to sixteen individual dwelling houses for Multi family housing and seniors may inherently increase the maximum population from the existing 2 seniors per duplex to up to 3 or more family members per 16 dwelling units.**

Islands Trust must not ignore this potentially large human impact claiming that it's all just the same square footage...and therefore just a minor change; without conducting credible research and an environmental impact assessment on this sensitive site. In fact this original zoning as I understand it was approved over 22 years ago and has never received the benefit of any critical look at the potential impact to our neighbourhood, the aquifer, the busy roadway, or the noise and congestion **given the considerable activities already occurring** at the Church of St Mary Magdalene.

Part of this significant density concern is there is **no description or clarity in this bylaw on how seniors units and affordable units would be designated or divided amongst the proposed 16 individual dwelling units.** The new bylaw speaks of **multiple adjoining units** and **"stand alone dwelling units"**, however, technically, under this proposed bylaw; a developer could potentially build all multi family affordable units and no senior units at all. It seems there is also no protection at this planning stage preventing a developer from trying to develop 16 separate "small house" dwelling houses around the entire property. This is certainly not what was envisioned by the planners 22 years ago and this is suddenly called a minor change and that no Community Information Meeting or evidence based decision making is required

Increased Density Summary:

1. The original senior housing approved eight duplexes for seniors with a maximum of 969 sq ft per dwelling unit; so potentially 16 homes. Therefore at any time there could be a minimum of 16 single seniors in each duplex or 32 senior couples. Realistically some seniors were likely to be single, so it is safe to project that this project was approved understanding that on average there would be approximately **24 people, plus vehicles on the property.**

2. The proposed change to add affordable housing for Multi-Family residents is an understandable effort to attract legitimate developers who typically build multiplex buildings at approximately 1000 sq ft per dwelling unit (and would continue to be limited to 969 sq ft) normally with 3 bedrooms, such as Habitat for Humanity does. Although Habitat has different qualifying rules for applying for their program, normally it is at least one parent and a requirement of a minimum of one child under the age of 16 or 18 years. Typically an internet search of Habitat in BC will have photos of 3 to 4 family members inhabiting these dwelling units and I am assuming Mayne Island

would be similar. Because this bylaw does not address what the mix of residents will be allowed, a prudent course is to determine the maximum impact to the site, which could be 16 dwelling units, each with a family of 4 which represents a potential population increase of **64 people with vehicles on a 5 acre parcel**. This bylaw is silent on all these potential numbers and if there will even be a requirement to build seniors housing and if so what ratio of the 16 this will be.

Conclusion: To conclude, approving 16 dwelling units for affordable housing and seniors could result at some point in a maximum addition of 64 people into our community, along with a considerable increase in vehicles and congestion. If seniors housing is ever built as part of the 16 units this may mitigate the numbers down, but the bylaw is mute on this aspect and **I do not believe developers like Habitat for Humanity are in the business of building dwelling units for seniors**. Generally there is not a large demand for senior housing on our island as most seniors as they age require more medical care and support which causes a move off island to where this is more available. This is a fact. **Seniors housing may never be built at this site unless it is somehow required by this bylaw.**

Despite I do not believe this location is suitable for seniors or children and understand clearly that this site may never become available, these above concerns must be addressed in order to have a well researched fulsome bylaw.

More clarity and protection at this planning stage is required to ensure if any housing project ever goes ahead there has been the requisite due diligence that this beautiful historic rural property deserves.

Richard Milne
Mayne Island,BC.