

October 15, 2025

TO: Salt Spring Island Local Trust Committee
RE: Zoning Bylaw No. 549 (PLRZ20250220, 154 Kings Lane)

GISRA has noticed some provisions in the bylaw's subdivision and servicing requirements that are somewhat confusing. Due to current job action, we were unable to clarify these points with staff advance of Bylaw readings 1-2 at your October 16, 2025. As such, we direct this letter to the Local Trust Committee instead of through staff as we normally would.

Rather than delay progress, we would like to request that readings 1-2 of Bylaw No. 549 proceed now, with any small adjustments that may be needed to clarify the Minimum Lot Areas and Servicing Requirements table be made prior to third reading. The area of potential ambiguity or confusion is:

- Minimum water service required for subdivision includes adequate supply of potable water -or- community water; footnote 2 clarifies this can be one or the other, or a combination of both, but must be adequately serviced by at least one.
- We seek clarification and/or minor revisions to provide clear direction that this water service level would apply to both the minimum area of an individual lot (0.11 ha) and to the minimum average area of lots (0.6 ha). These are currently worded differently in draft Bylaw 549, as shown below:

2.5 **Section 9.9 – RESIDENTIAL ZONES**, Subsection 9.9.3 – Subdivision and Servicing Requirements is amended by inserting column R13 in the table as follows:

	R13
Minimum Lot Areas and Servicing Requirements	
Minimum water service required for subdivision:	
Adequate supply of <i>potable</i> water	● ²
<i>Community water system</i>	● ²
Minimum sewage service required for subdivision:	
Individual on-site sewage treatment system per <i>lot</i>	N/A
<i>Community sewage collection system</i>	●
Minimum area of an individual lot that may be created through <i>subdivision</i> provided each <i>lot</i> has an individual onsite sewage treatment system and an adequate supply of <i>potable</i> water (ha)	N/A
Minimum area of an individual lot that may be created through <i>subdivision</i> provided each <i>lot</i> has an individual onsite sewage treatment system and connection to a <i>community water supply</i> (ha)	N/A
Minimum area of an individual lot that may be created through <i>subdivision</i> provided each lot has connection to a <i>community sewage collection system</i> and a <i>community water system</i> or <i>adequate supply of potable water</i> (ha)	0.11
Minimum average area of lots in a <i>subdivision</i> , provided each <i>lot</i> has an individual on-site sewage treatment system and an adequate supply of <i>potable</i> water (ha)	N/A
Minimum average area of lots in a <i>subdivision</i> , provided each <i>lot</i> has an individual on-site sewage treatment system and connection to a <i>community water system</i> (ha)	N/A
Minimum average area of lots in a subdivision , provided each lot has connection to a <i>community sewage collection system</i> and a <i>community water system</i> (ha)	0.6

²May be adequately serviced by one or the other, or combination of both, but must be adequately serviced by at least one.

As such, we request that the LTC pass the following motion:

That Salt Spring Island Local Trust Committee direct staff to work with the applicant (PLRZ20250220, 154 Kings Lane Road) to make any amendments necessary prior to 3rd reading of Bylaw No. 549 that would remove any ambiguity regarding service levels and ensure the subject property can be subdivided into two lots, with a minimum lot size of 0.11 ha, provided water is supplied by either a community water system, or an adequate supply of potable water.

It is our understanding that a minor clarification, such as we have proposed, would not change the intent of the bylaw and would therefore not require re-notice.

Thank you for your consideration of our request.

Regards,
Harry Barnes

A handwritten signature in black ink, appearing to be 'HB' followed by a long horizontal stroke.

Executive Director, GISRA