

February 19, 2008

Russ Fuoco  
Director of Planning Services  
District of Saanich  
770 Vernon Avenue  
Victoria, BC  
V8W 3E7

Dear Russ Fuoco:

**Re: Comments on Saanich Draft Official Community Plan  
Secondary Suite Policies**

We are a group of Saanich residents residing in the Camosun neighbourhood who support legal secondary suites. We are responding to your request for comments on the draft Official Community Plan (OCP). Our comments relate specifically to the issue of secondary suites. We are pleased to see some mention of the subject, most notably in Section 5.1.2, but feel strongly that the policies, as worded in the current draft, are too weak and leave out many important elements.

- **Secondary suites provide many benefits to renters, homeowners and communities:**  
According to the provincial government's document *Secondary Suites: A 2005 Guide for Local Governments in B.C.* (available at: [www.housing.gov.bc.ca/housing/suites/](http://www.housing.gov.bc.ca/housing/suites/)), secondary suites provide an excellent source of affordable housing. This is accomplished not only by providing affordable rental suites, but also by providing rental income to the owners, thus acting as a mortgage helper and making home ownership more accessible.

Being typically located at ground level, secondary suites can provide accessible housing for seniors and persons with disabilities. They allow families to stay together and people to age in place. Energy consumption can also be more efficient on a per capita basis in single-family dwellings with secondary suites when compared to those with unfinished or unused basements.

- **Legalization of secondary suites is consistent with the Saanich Vision:**  
Encouraging legal secondary suites fulfills the Vision expressed in Section 3 of the OCP in several ways:
  - Ensures housing is “affordable, accessible and inclusive”.
  - Responds to climate change by using energy more efficiently.
  - Assists with efforts “to improve and balance the natural and built environments” since much needed housing can be provided within existing structures, leaving more natural areas undeveloped.
- **Legalization of secondary suites will ensure that existing federal grants are available to Saanich homeowners:**  
Canadian Mortgage and Housing Corporation (CMHC) offers forgivable loans as part of the Residential Rehabilitation Assistance Program for any necessary renovations, but these loans continue to be inaccessible to Saanich residents because secondary suites are still illegal here. Policies and bylaws need to support maximizing the use of existing housing stock and associated provincial and federal grant programs.

- **Secondary suites are an important source of housing for Saanich's growing student population:**

Absent from the document is any mention of Saanich's large student population and how it relates to housing issues. Section 3.3 does not even mention students as a component of "residents," despite the fact that half of the University of Victoria and both campuses of Camosun College are located in Saanich. There should be at least some recognition of this fact and ideally some commitment to support affordable housing options for students specifically.
- **Legalization of secondary suites is consistent with approved regional strategies and the direction of neighbouring jurisdictions:**

Legalization of secondary suites is a key recommendation of the *2007 CRD Housing Affordability Strategy*. In addition, the municipalities of Victoria, View Royal, Central Saanich, Sidney, Langford, Metchosin, Colwood and Sooke already allow secondary suites. Saanich has hundreds of suites already in use.
- **Legalization of secondary suites better responds to the current demographic profile:**

As outlined in Section 3.3 of the OCP, average household size is decreasing. Saanich's housing stock is dominated by single-family dwellings originally built for larger families. These dwellings are now often underused, a situation that increases per capita energy use. Many smaller households, especially older "empty nest" couples are finding themselves in dwellings built to house much larger families, and would like to make use of the extra space. Under current zoning bylaws, however, sharing a single family dwelling with more than four unrelated adults, putting in or renting out an existing secondary suite is prohibited.
- **OCP policies should recognize the opportunity to maximize the use of existing housing stock:**

The draft plan offers some good policies for supporting the construction of new affordable housing (density bonusing, housing in conjunction with community centres, supporting grow homes, flex housing, etc.), but new construction consumes large amounts of energy and materials and produces one of the largest components of our waste. Maximizing the use of our existing housing stock is environmentally and economically less costly and should be encouraged. Allowing secondary suites is one way to do this; allowing more than four unrelated adults to share one household is another (and doesn't require any construction or renovation at all). Both strategies should be examined.
- **Standards for secondary suites should provide for acceptable safety and accommodate the goal of affordability:**

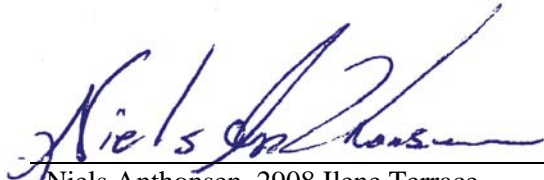
Safety and construction standards also need to be advanced but inspection is required to ensure compliance. Owners of existing secondary suites may be discouraged from declaring their suite if the registration process is overly complex or requires costly upgrades and expensive fees. An initial phase of legalization where existing suites are grandfathered in based on a basic health and safety inspection is one strategy that balances these concerns:

  - Encourages owners to come forward.
  - Ensures minimum safety and liability concerns are addressed.
  - Protects from eviction those tenants living in suites that meet acceptable health and safety standards but might require costly upgrades to fully comply with current codes.

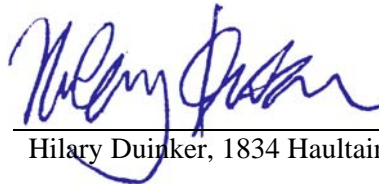
In closing, we note that there is widespread public support for the legalization of secondary suites, as evidenced from the results of the recently-completed Saanich Residents' Survey. We therefore encourage you to strengthen the policy language in the next OCP draft to ensure a solid commitment to the process of legalization. The new OCP for the Township of Esquimalt, adopted in March 2007, provides an example of more committed language.

We also recommend that Saanich initiate a timely public process to update its zoning bylaw to allow and regulate secondary suites. Given the amount of public input already gathered to date (including statistically significant survey results directly related to this issue) and the severity of the housing affordability issue in Saanich and the region, this process should be initiated without delay.

Sincerely,



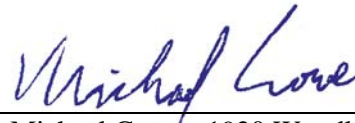
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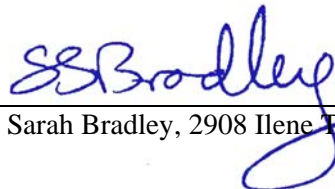
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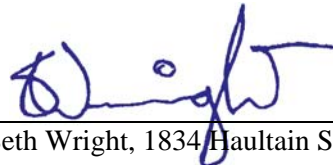
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