



File: 0470-43

May 18, 2016

Ms Signe Bagh  
Senior Manager Regional and Strategic Planning  
Capital Regional District  
PO Box 1000  
Victoria BC V8W 2S6

Dear Ms Bagh:

**Re: District of Highlands Comments into the Draft Regional Growth Strategy**

In response to the CRD Board's request for informal input on the most recent Regional Growth Strategy draft, we respectfully submit the following feedback, including a request for clarity around draft RGS policy 1.2 (3).

It remains the District's intention for these comments to constructively provide views that represent the Highlands' strongly rural viewpoint. The District maintains a strong commitment to providing alternatives to urban development; to preserve nature; and to provide nature oriented recreation opportunities for the region. The continued protection of these rural values is considered in the highest of the community's priorities.

**Council's feedback:**

1. Council wishes to reaffirm its position that the Regional Growth Strategy should continue to use water servicing as a growth management tool. Council's view in regards to being "silent" on water servicing goes against the premise of being proactive with respect to growth management. Other commentary and rationale:
  - (i) It remains Council's opinion that extending piped water services beyond the RUCSPA would alter rural growth patterns. The "right to clean water" for Highlanders means sound planning and caring for the environment in a manner that respects and protects all water sources.
  - (ii) For the Highlands, controlled access to piped water has proven to be the most effective strategy to limit growth outside of the Highlands Servicing Area (which is the RUCSPA within the Highlands).
  - (iii) Expanding piped water services outside of the RUCSPA reduces the resilience of the entire water system and especially those already serviced by

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piped water. Expansion would increase risk from earthquakes and from impacts of climate change.

2. The District seeks clarity in regards to the interpretation of limits to rural growth with respect to two local (Highlands) issues further explained below – potential policy development for secondary accommodations and amenity rezonings. The District wishes to assure that its own goals and objectives can be maintained through the Region’s RGS. It is clear through the draft RGS that the CRD collectively would propose to restrict growth in areas outside the RUCSPA to 5% (draft RGS policy 1.1). Draft RGS policy 1.2 (3) provides some additional direction specific to rural communities, but that direction is unclear as to how that 5% would be distributed. For ease of reference, draft RGS policy 1.2 (3) states:

“...Restrict development potential on lands identified as Capital Green Lands, Renewable Resource Lands, and Rural/Rural Residential on Map 3 to subdivision and density limits in the designated official community plan as determined at the date of the adoption of the Regional Growth Strategy Bylaw. Regional Context Statements could reference specific mechanisms (for example, density bonusing provisions) that could be used to achieve this overall goal.”

(The District of Highlands understands that the “date of the adoption of the RGS Bylaw” referred to above is the adoption date of this latest draft, be it 2016, 2017. Please advise if this is incorrect.)

***With respect to Secondary Accommodations:*** The District will be potentially considering policy and regulations in regards to secondary accommodations, such as secondary suites, carriage houses, etc. While the majority of the policy and regulations would be aimed forward, some of the policy development is expected to be reactive due to existing suites, etc. What direction any of this will take is yet to be seen. Because of this unknown, the District wishes to have the freedom to develop its own land use policy and regulations while respecting the overall intent of the Regional Growth Strategy.

***With respect to Amenity Rezonings:*** The District’s policy around amenity rezonings acknowledges that the District is willing to accept some growth providing that there is a demonstrable benefit to the community. This policy direction has been reflected back to the CRD through the District’s Regional Context Statement, which states (in Table 10.1, under RGS Strategic Direction of “Protect the Integrity of Rural Communities”):

“Policy 2.2 (20) generally allows for public amenity proposals through rezoning. Appendix A elaborates by explaining that the basic premise of an amenity proposal is that the value of the additional density gained by a developer through an amenity rezoning should be shared between the community and the

developer. Highlands Sustainability Appraisal Form Policy and Amenity Rezoning Considerations Policy together provide criteria to help assess applications. Highlands has gained significant green space and park over the years for the region through its public amenities policy.”

While the Highlands has relied on the above policy for amenity rezonings, it has never been exactly clear what the “limit” of growth is. With the understanding that the District is not seeking urban-type development outside its version of the RUCSPA, the District acknowledges that growth over time may be compounded due to these two local issues and seeks clarity for mutual cooperation.

3. Council wanted to express their disappointment with the loss of the overall intent of the RSS (March 2015 version). Council supported that document’s attempt to fully integrate sustainability objectives into planning for the region. Council felt that incorporating the deleted material into various other documents would risk compartmentalizing the policies that seemed to amount to more than their individual effects when placed all together in one policy document. Full integration of these values would be more effective for implementation, both in policy and public education and resulting action.
4. Council wishes to offer a suggestion for defining growth:
  - (i) Growth could be defined as increases in energy use, water consumption, waste production, GHG emissions, and amount of manufactured capital because it is fundamentally these items that contribute to climate change. While increases in population typically accompany increases in these items, defining growth by the actual contributors to climate change may assist in changing human behaviour to reduce over impacts. The population of the CRD continues to grow, and the challenge remains to reduce impacts on the local carrying capacity of the region.
  - (ii) Using this concept and as a suggestion toward clarity in regards to the interpretation of limits to rural growth, if 5% is the targeted growth rate for areas outside the RUCSPA, perhaps the 5% measures the increase in manufactured capital (specifically dwellings) instead of numbers of people. It was felt that this would allow the District of Highlands to meet the functional objectives of limiting growth without impacting the ability to meet sustainability objectives of creating smaller and more affordable housing options.
5. In regards to policy 2.2 (3) and its reference to “water”, Council expressed that the policy should inherently connect “rural” water (i.e. groundwater or other individual sources) with “urban” water (i.e. piped regional water services). This inclusion brings awareness of the interconnectedness of all water sources as a limited resource not only for human consumption but for ecological services.

6. Council noted the importance of ensuring that all legislative requirements in respect to the RGS are met.

If you have any questions, please contact Laura Beckett, Municipal Planner, at 250-474-1773 or [LBeckett@highlands.ca](mailto:LBeckett@highlands.ca).

Your truly,

A handwritten signature in blue ink that reads "Lorraine Hilton". The signature is written in a cursive, flowing style.

Lorraine Hilton  
Chief Administrative Officer

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