July 30, 2026

Via email to: HMA.Minister@gov.bc.ca

The Honourable Christine Boyle
Minister of Housing and Municipal Affairs

Dear Minister Boyle,

Re: Response to Proposed Housing Supply Directives and Enhanced Reporting

On behalf of Mayor and Council, thank you for your letter dated June 16, 2026, regarding the proposed Housing Supply Directives and Enhanced Reporting Requirements under the *Housing Supply Act*, and for the courtesy of your extension of time to provide feedback. We appreciate the work undertaken by the appointed Advisor, Ministry staff, and all those who participated throughout the review process.

Overview

The District of North Saanich recognizes the importance of increasing housing supply and affordability throughout British Columbia and remains committed to working collaboratively with the Province to achieve these shared objectives. Council recognizes the critical role of local governments in facilitating housing development; however, municipal housing policy must be systematically balanced with infrastructure capacity, long-term fiscal sustainability, environmental stewardship, agricultural preservation, and sound land use planning, while respecting the government's CleanBC plan to lower climate-changing emissions by 40% by 2030 and impacts of climate change.

Council appreciates that the Advisor's Report contains recommendations intended to strengthen the District's planning and development processes. Many of those recommendations build upon work already underway. The District supports measures that improve the efficiency, predictability and transparency of development approvals and recognizes that streamlining municipal processes, while maintaining appropriate technical review and public accountability, is an important component of increasing housing supply.

The Official Community Plan (OCP) adopted by Council in July 2025 represents the District's current land use policy framework and the primary mechanism through which Council intends to achieve both local and provincial housing objectives. Developed through extensive technical

analysis, consultation with provincial agencies, engagement with Indigenous Nations and significant public participation, the OCP establishes an ordered approach to accommodating future housing through reasonable density, secondary suites, seniors' housing, and mixed-use development within serviced areas, while simultaneously safeguarding agricultural lands, environmentally sensitive areas, municipal natural asset and engineered asset capacity, and the rural character of North Saanich.

Since adopting the OCP, the District has been actively implementing it through preparation of a comprehensive new Zoning Bylaw, modernization of development approval procedures, organizational improvements and refinement of internal processes. Council's Strategic Plan also identifies the implementation of Development Cost Charges and Amenity Cost Charges as priorities to ensure future growth is supported by appropriate infrastructure planning and long-term fiscal sustainability. Council respectfully submits that the Ministry should afford it the opportunity to implement and evaluate the effectiveness of this recently adopted planning framework, before issuing significant new directives that fundamentally alter the assumptions that underpin that framework.

Advisor's Report: A Correction

Council wishes at the outset to clarify a factual matter contained within the Advisor's Report, which forms the basis of Enhanced Reporting Item 5.

The Report states that the District designated lands under the jurisdiction of the Victoria Airport Authority for residential development and included associated housing capacity within the OCP. This is not correct. The Development Permit Area identified for the airport lands is aspirational only and recognizes long-term redevelopment potential should the federal landowner determine redevelopment is appropriate. The District has no jurisdiction over these lands and did not include residential unit capacity associated with the airport lands within the housing projections of the OCP. As a standalone matter and on account of this factual error, Council respectfully requests that you reconsider Enhanced Reporting Item 5.

Specific Comments on Proposed Directives and Enhanced Reporting

Council appreciates that several of the proposed directives align with work already underway and remains committed to working collaboratively with the Ministry. Council's principal concern arises from the cumulative effect of Directives 2, 3 and 4. Together, these measures would substantially increase development potential by reducing parking requirements, expanding subdivision opportunities, reducing minimum lot sizes and increasing permitted densities. Collectively, they would materially alter the pace, scale and location of growth contemplated through the recently adopted OCP.

With respect to Directive 1, Council supports initiatives that streamline development approvals and recognizes that expanding delegated authority for minor development variance permits, as contemplated by the Advisor's Report and defined by Council, represents a practical opportunity to improve efficiency while maintaining appropriate Council oversight of significant planning matters. The District believes this directive can be implemented by the proposed July 31, 2027 deadline.

Similarly, Council supports reducing minimum parking requirements where appropriate and believes an approach based on the number of bedrooms would better reflect local housing needs than a single parking standard requiring a minimum of 1.2 spaces per dwelling unit. This approach is consistent with standards adopted by neighbouring municipalities. A uniform provincial standard presents challenges for municipalities like North Saanich, where high-frequency transit service remains constrained.

Council cannot support Directive 3 in its current form. The proposed reductions in minimum lot sizes, mandatory rezoning of existing R-2 lands, expanded subdivision opportunities and related land use changes would significantly increase development potential before implementation of the recently adopted OCP has been completed.

The OCP deliberately calibrates housing objectives against agricultural protection, environmental stewardship, infrastructure sequencing, and long-term fiscal sustainability. These remain valid legislative and planning considerations that align with the Capital Regional District Regional Growth Strategy, which directs urban growth toward established serviced areas to mitigate urban sprawl.

Council is generally supportive of measures that increase housing choice within existing neighbourhoods. This includes many of the provisions contemplated in Directive 4, provided that they: (a) can be appropriately integrated into the current Zoning Bylaw review; (b) remain consistent with the OCP and the Capital Regional District Regional Growth Strategy; and (c) are informed by an assessment of the cumulative housing capacity created by all proposed changes.

Although this matter arises from a proposed additional reporting requirement rather than a Directive, Council cannot support any movement of the Urban Containment Boundary within North Saanich, nor the inclusion of Dean Park Estates in Area 3, the Southeast Quadrant, as suggested in the Advisor’s Report. Both the District’s recently adopted OCP and the Capital Regional District Regional Growth Strategy seek to protect agricultural land and contain urban sprawl, and extension of the Urban Containment Boundary in the three areas addressed under Enhanced Reporting would run counter to these goals. Council is strongly of the view that urban growth can and should occur in areas already within the Urban Containment Boundary.

Council's Proposal

Council believes the appropriate and best course of action in pursuit of the aims of the *Housing Supply Act* is to complete implementation of the OCP, evaluate the cumulative housing capacity that creates, and assess associated infrastructure impacts. It should be at that stage, and not earlier, that the Ministry assesses whether further regulatory changes remain necessary to achieve provincial housing objectives. Indeed, it would seem premature to act at this stage through the issuance of directives, and might suggest that politics are prevailing over regional planning.

Municipalities have an important responsibility not only to facilitate housing, but also to ensure that growth is supported by appropriate infrastructure and delivered in a financially sustainable manner. Nearly forty percent of North Saanich lies within the Agricultural Land Reserve and approximately thirty percent consists of federal or provincial lands. Existing servicing and infrastructure constraints continue to influence future growth opportunities and reinforce the importance of appropriately sequencing significant increases in residential density.

The District is already undertaking work to quantify the cumulative residential capacity created through implementation of the OCP and comprehensive Zoning Bylaw update. This work will enable Council to compare anticipated housing capacity against the District's Housing Target Order while ensuring future growth remains aligned with infrastructure planning, financial sustainability and the Regional Growth Strategy.

Council notes that under s. 11(2) of the Act, the Minister may issue directives only if satisfied that (a) the benefit of issuing the directive is greater than the benefit of not issuing it, (b) no less onerous alternative would result in the specified municipality meeting, or making satisfactory progress toward meeting, a housing target that applies to it, and (c) issuing the directive is in the public interest. Further, s. 7(1)(a) of the Act requires the Minister to consider official community plans that were not available when the housing target order was made. In considering the proposed directives and these responding comments, Council respectfully requests that you clarify the statutory considerations that informed the Province's preliminary decision, including:

- **Statutory Alignment**: The extent to which the Province evaluated the District's recently adopted OCP during the formulation of the proposed directives;
- **Sequencing:** The policy rationale used to determine that the immediate implementation of the proposed directives at this stage is preferable to allowing the District to complete implementation of the OCP through the comprehensive Zoning Bylaw review already underway; and

- **Cumulative Impact Analysis:** The methodology utilized to evaluate the cumulative impacts of the proposed directives on municipal infrastructure, servicing capacity, long-term financial sustainability and regional growth management.

Council also notes that the Advisor's Report and the proposed directives were received concurrently, providing limited opportunity for the District to fully consider the recommendations before significant regulatory changes were proposed. Given the scale of the proposed changes, Council believes additional dialogue between the Ministry and the District would better support implementation informed by the District's recently adopted OCP, ongoing planning initiatives and current infrastructure analysis.

Accordingly, Council respectfully requests that the Province refrain from issuing Directives 3 and 4 in their current form and instead allow the District to complete implementation of its recently adopted OCP through the comprehensive Zoning Bylaw review currently underway. Should the Province determine that additional measures remain necessary following completion of that work, the District welcomes continued collaboration with the Ministry to identify planning approaches that support provincial housing objectives while respecting the Regional Growth Strategy, protecting agricultural lands and environmentally sensitive areas, ensuring infrastructure readiness and maintaining the policy direction established through the OCP.

Council further requests that the Province provide any Consumption of Services Reports undertaken in support of proposed Directives 3 and 4. If such analyses have not been completed, Council respectfully requests that the Province fund a municipal-scale Consumption of Services Report for the District of North Saanich and defer implementation of these directives until this work has been completed and the District has had the opportunity to review the findings and provide its advice to the Province.

Adopting proposed directives 2, 3 and 4 now would effectively render the District's significant efforts in adopting its OCP, including the extensive technical analysis and engagement described above, a wasted effort and would communicate to residents that their views and preferences about where they live carry little weight. Council respectfully suggests that in effectively overruling the OCP, the proposed directives represent an onerous requirement on the District and that less onerous alternatives are available—notably including allowing the District to pursue its comprehensive Zoning Bylaw review and further engagement between the District and the Ministry, as described above. Further, as the District works towards meeting the provincial policy objectives, there is a public interest in allowing Council to proceed in a manner that respects the wishes of its constituents. Municipalities are often "closest to the citizens affected" by law-making and implementation and "thus most responsive to their needs, to local distinctiveness, and to

population diversity."[1] The District's constituents were engaged throughout the OCP process and continue to be engaged on the District's efforts towards meeting the provincial housing targets. There is significant value in allowing the District to work toward the provincial housing targets in a manner that is responsive to its constituents' preferences and concerns. The District values its collaborative relationship with the Province and remains committed to working constructively to increase housing supply while ensuring growth is environmentally responsible, fiscally sustainable and consistent with regional planning objectives. We welcome the opportunity to continue working directly with Ministry staff throughout implementation of the Housing Target Order and believe this collaborative approach offers the greatest opportunity to achieve our shared housing objectives while respecting the significant planning work already completed by the District and the community.

Thank you for your consideration of Council's comments. We look forward to continuing our partnership with the Province to deliver housing in a manner that is sustainable, well-planned and reflective of both provincial priorities and the long-term vision established through North Saanich's OCP.

Yours sincerely,



Mayor Peter Jones
On behalf of North Saanich Council

[1] *114957 Canada Ltée (Spraytech, Société d'arrosage) v. Hudson (Town)*, 2001 SCC 40 at para. 3.