



Salt Spring Island Agricultural Alliance

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Salt Spring Island Local Trust Committee
Islands Trust

Re: Salt Spring Island Local Trust Committee Proposed Bylaw No. 526 - Farm Housing Project

The Agricultural Alliance is pleased that the Salt Spring Island Local Trust Committee has responded to the need for additional farmworker housing on agricultural land. Housing farmworkers and family members on actively farmed land is essential for ensuring adequate labour for farming, which can increase local food production and improve the economic viability of agriculture on Salt Spring Island (SSI).

Thank you for incorporating some of our previous feedback sent on November 17, 2021 into the proposed Bylaw No. 526. We are supportive of most of the proposed changes but believe additional amendments are necessary to secure a farm labour force, while protecting agriculture land on SSI for farm production over the long term. Most importantly, agricultural land should not be viewed as a way to significantly increase affordable housing on SSI and additional dwelling units should only be permitted where, and when, it supports enhanced local farm production.

The Agricultural Alliance is supportive of the amended farmworker dwelling unit definition, the additional allowances for dwellings and secondary suites and limiting the dwelling unit size to 500m². There was no consensus within our organization regarding the proposed use of covenants. While it is recognized that covenants are an effective legal tool for ensuring bylaw compliance, especially when farm properties are sold, some of our members are not supportive of this approach.

Additional recommendations for the bylaw amendments include the following:

1. The provision for additional farmworker housing should apply to all lots where agriculture is a permitted use and a commercial farm business is actively operating rather than being limited to lots located in Agriculture Land Reserve (ALR) with A1/A2 zoning. In 2017, thirty percent of the 1,133 hectares of actively farmed land occurred outside land zoned for agriculture¹. Not only will this approach provide additional farmworker housing, but does so on land that is not the best soil for agricultural production, which is mostly located in the ALR.
2. The bylaws should permit a secondary suite as either part of a principal residences or part of a farm accessory building on all lots being actively farmed. This approach would minimize impacts on arable farmland while adding additional dwelling units for farmworkers or family members.

¹ Agricultural Land Use Inventory Salt Spring Island. 2017. Ministry of Agriculture.

Enabling an additional housing unit within a primary residence, equipment storage or processing building is also more cost-effective for farm businesses, without additional impacts on the land base.

3. We have concerns about the removal of text in 9.1.1 that allowed sale of farm products from another farm. The ALR Use regulations requires 50% to be produced either on that agricultural land or by an association to which the owner of the agricultural land belongs, which means 50% can come from elsewhere. As written the new informative note suggests that 100% is produced on the agricultural land or by an association to which the owner of the agricultural land belongs. If it is not intended the bylaw be more restrictive, we recommend clearly referencing the 50% rather than simply saying "must be consistent with the ALR Use regulation".

With these additional revisions, we believe the land use bylaw would enhance the viability of local agriculture, while protecting agricultural land for farming into the future.

Thank you for considering these requests.

Salt Spring Island Agricultural Alliance

Sincerely



Anne Macey, President, Salt Spring Island Agricultural Alliance

SSIAA Member organizations:

Island Natural Growers

Salt Spring Island Farmers' Institute

Salt Spring Island Community Market Society

Salt Spring Island Farmland Trust

Salt Spring Abattoir Society

Salt Spring Island Community Economic Sustainability Commission

Salt Spring Island Chamber of Commerce

Transition Salt Spring