

District of North Saanich

Provincial Advisor Report and Recommendations

CBRE Development Strategy & Consulting final report for the
Ministry of Housing and Municipal Affairs



April 1, 2026

Independent Advisor report
examining the District of North
Saanich's progress towards
meeting its Provincially mandated
housing targets.



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Executive Summary

Summary of Key Findings

The District of North Saanich is not meeting the housing targets established by the Province under the Housing Supply Act. The District's Housing Target Order came into effect on August 1, 2024, establishing a cumulative five-year target of 419 net new units by July 31, 2029. In Year 1, the District delivered only 12 net new units against an annual target of 60, representing a 20 percent completion rate. CBRE Development Strategy and Consulting Group was appointed as an independent advisor in January 2026 to assess the reasons for this underperformance and provide recommendations to support improved housing delivery.

The District of North Saanich faces a genuinely complex set of overlapping challenges. These are not solely attributable to the actions or decisions of any individual or group, and it is important to acknowledge that the District operates in a context of significant organizational transition, constrained staff capacity, and a community with important values around rural character preservation. At the same time, CBRE's review has identified a number of policy, regulatory, administrative, and governance factors that may be collectively limiting the District's ability to meet its statutory housing obligations. These include:

- **OCP Structural Constraints:** The 2025 Official Community Plan, while signalling alignment with housing targets, contains height limits, Floor Area Ratio (FAR) caps, and parking requirements that make financially viable multifamily development difficult to achieve under current policy.
- **Urban Containment Boundary Misalignment:** The Urban Containment Boundary (UCB) does not align with the need for additional housing supply in the District, preventing the application of Small-Scale Multi-Unit Housing (SSMUH) legislation across key growth nodes and limiting the density the District can support.
- **Planning Department Turnover:** Significant and sustained staff turnover since 2022, including the loss of multiple senior leadership and planning roles, has affected departmental capacity, continuity, and the pace of critical files, including the Zoning Bylaw update, which is overdue since December 31, 2025.
- **Approvals Process:** The development approvals process relies heavily on Council involvement in routine technical matters, sometimes creating uncertainty for applicants and extending processing timelines for policy-aligned applications.
- **Federal Airport Land Designations:** A misalignment between the District's OCP designations and federal jurisdiction over Victoria Airport Authority lands has overstated the District's realistic housing capacity and created friction with a key regional infrastructure partner.

- **Absence of Development Finance Tools:** The District has not enacted Development Cost Charge or Amenity Cost Charge bylaws, preventing growth from funding the infrastructure required to support it and contributing to ad hoc cost negotiations that reduce development predictability.

CBRE's review finds that the District's planning staff are working in a demanding environment and that many of the challenges identified are systemic rather than a reflection of individual performance. The recent engagement of McElhanney to support the now overdue Zoning Bylaw update is a positive step, and there is evidence of meaningful latent market demand for housing across a range of typologies in North Saanich. However, without meaningful changes to the regulatory environment, the approvals process, and the organizational conditions that support housing delivery, the District is unlikely to meet its near- or long-term housing targets. The 208-unit projection for Year 2 is unlikely to be achievable under the status quo.

Summary of Key Recommendations

- **Delegation of Minor Development Variance Permits:** Amend the Development Application Procedures Bylaw to delegate minor variance approvals to planning staff by December 31, 2026.
- **Updated Parking Requirements:** Reduce off-street parking requirements to align with market demand, targeting a sliding scale depending on unit size, to a maximum of 1.5 stalls per unit for multi-family housing.
- **Realignment of Federal Airport Land Designations:** Remove residential designations on Victoria Airport Authority lands.
- **Modernization of Subdivision and Lot Standards:** Reduce minimum lot sizes to 925m² in R1 zones, remove panhandle restrictions, and permit duplexes and townhouses in residential zones.
- **Expansion of Accessory Development Potential:** Increase secondary suite and guest cottage maximums to 110 m², remove percentage-based size limits, and permit concurrent units on lots 1 acre or larger.
- **Supporting Priority Housing Applications:** Adopt the necessary OCP and Zoning amendments to enable the 92-unit McDonald Park Road project and provide a status report on all other active applications.
- **Urban Containment Boundary (UCB) and Strategic Development Areas:** Prioritize UCB extension to align with the CRD Regional Growth Strategy, focusing on McTavish Interchange, Tsehum Harbour, and the Southeast Quadrant - Allegro School Site.
- **Procedural Streamlining:** Review and limit the Community Plan Advisory Committee's (CPAC) role in policy-aligned development applications to reduce timeline uncertainty.
- **Development Finance Tools:** Pursue DCC and ACC bylaw amendments with the ACC using a fixed unit price metric and provide an update in the Year 3 annual report (mid-September 2027).

- **Pre-Application Tracking:** Implement a development approvals tracking system and provide quarterly project status reports to the Province.
- **Technical Studies:** Undertake financial viability testing, land capacity analysis, and parking demand analysis and provide an update in the Year 3 annual report (mid-September 2027).
- **Processing Timelines:** Establish a four-month target from pre-application to Council approval for policy-conforming files.
- **Departmental Resourcing:** Institute formalized operating procedures and structured onboarding to stabilize Planning Department capacity and retention.
- **Third-Party Technical Review:** Establish a framework for independent peer review of contested technical reports.
- **Density and Infill Policy:** Revise multifamily designations to support development up to six-storey in areas with sufficient infrastructure (Areas 1 and 2) and designate the Southeast Quadrant as a gentle infill area.
- **Seniors Housing:** Introduce density bonuses and reduced parking minimums for seniors' housing and assisted living facilities.
- **Financial Incentives:** Implement Revitalization Tax Exemptions in key growth nodes and expedite master-planned communities.
- **Intergovernmental Relations:** Engage constructively with the CRD, Victoria Airport Authority, and neighbouring First Nations to resolve jurisdictional and servicing considerations.
- **Public Communications:** Develop a data-driven communications strategy to support informed community engagement on housing policy.

Achieving the District's housing targets is possible, but it will require structural change across regulatory, administrative, and governance dimensions. The recommendations in this report are intended to support that change in a way that respects the District's rural character while meeting the Province's legitimate expectations for housing delivery.

1 | Project Introduction

This review was initiated under the Province of British Columbia's Housing Supply Act after the District of North Saanich failed to meet its first-year housing target and demonstrate satisfactory progress toward achieving it. Over a 10-week period, CBRE completed a focused assessment of the District's planning framework, decision-making processes, infrastructure and land capacity, and alignment with Provincial housing legislation. The work included document and data review, Council meeting analysis, benchmarking, and Council, staff and stakeholder interviews to identify key barriers to housing delivery.

1.1 Provincial Mandate and Housing Target Order

The Provincial mandate for this review was set out by the Minister of Housing and Municipal Affairs under the Housing Supply Act. The District of North Saanich's (the "District") Housing Target Order (the "HTO") came into effect on August 1, 2024, establishing a cumulative five-year target of 419 net new housing units by July 31, 2029.

CBRE Development Strategy and Consulting Group ("CBRE") was appointed as an independent advisor midway through the second year of the HTO term, with official work commencing on January 19, 2026. This statutory intervention was triggered because the District failed to meet its Year 1 annual housing target of 60 units, delivering only 12 net new units (a 20 percent completion rate), and failed to demonstrate satisfactory progress toward creating the administrative and regulatory conditions necessary for future housing development.

1.2 Areas of Focus

This review was conducted over a 10-week timeframe. CBRE utilized a comprehensive methodology combining both qualitative and quantitative approaches to assess the systemic, physical, and political barriers to housing delivery in the District. The mandate established the following specific areas of focus for this review:

- The Official Community Plan process, including an evaluation of Council advisory and sub-committee decisions, public engagement efforts, the work completed by MODUS Planning, Design & Engagement Inc. ("MODUS"), and the status of the Victoria International Airport and Zoning Bylaw amendment.
- Assessment of the District's approach to implementing Small-Scale Multi-Unit Housing (SSMUH) legislation, including alignment with site standards, and a review of the Urban Containment Boundary (UCB) as a regional policy.
- Analysis of Council decisions on housing proposals that were not approved, including rationale and alignment with the Housing Target Order, along with proposals that did not make it to Council for review.

- Analysis of the District’s infrastructure readiness, land capacity, and availability to support future housing development.
- Examination of Council decision-making processes, staff capacity, culture, and turnover, and the District’s commitment to meet housing targets.
- Analysis of the District’s data collection and reporting practices, and any actions or plans intended to improve these systems and practices.
- A review of comparative municipalities to assess the progress of similar sized municipalities that have improved processes to increase housing supply.
- Review of minutes and/or video recordings of Council meetings that are open to the public to better understand the types of housing development, Council decision making, and community input relevant to development application decisions; and
- A validation of the timeframe and forecast number of units associated with the updated Official Community Plan and amended Zoning Bylaw listed in Section 8 – Planned Action Summary of the District’s Year 1 Housing Targets Progress Report.

1.3 Information Review and Interview Process

The assessment involved research and analysis of municipal documents, internal systems, and materials provided by the Ministry of Housing and Municipal Affairs Housing Target Branch, the District, and third-party sources. This included a review of relevant publicly available Council meeting minutes and recordings to understand decision-making patterns, the treatment of development applications, the consideration of professional advice, and the role of community input in shaping housing outcomes. Further, the analysis examined development activity and approval trends across housing types, financial feasibility under current policy, and the capacity of core infrastructure systems to support current and future residential growth.

As directed by the Province, CBRE also undertook targeted interviews to supplement the document and data review, ensuring perspectives were captured from those directly involved in policy, administration, and residential development. These discussions were intended to validate findings, understand operational realities, and identify systemic challenges impacting housing outcomes. Interview participants included:

- Current and former municipal staff
- Current members of Council and the Mayor
- Active developers operating in the community
- Third-party consultants retained by the municipality
- Other stakeholders

2 | Key Findings

Chapter 2 outlines the key findings from CBRE's analysis with the goal of providing a clear understanding of the various factors impacting the District of North Saanich's ability to meet its housing targets. The evidence points to a series of interrelated governance, policy, administrative, and infrastructure constraints that collectively deter viable development, including restrictive land use regulations, procedural delays, resistance to density, and constrained staff capacity. A comparative review of past and current OCP designations, zoning bylaws, Small-Scale Multi-Unit Housing (SSMUH) dynamics, development applications, and organizational structures indicates that the adopted policy environment is not aligned with market demand or the District's housing targets, and that meaningful progress requires structural changes and, to some extent, provincial directives.

2.1 Interviews Summary

Interviews with staff, elected officials, and key stakeholders indicate that housing underperformance in North Saanich is not attributable to weak market demand. There is evidence of developer interest, logical growth areas, and servicing capacity in select locations. Rather, a set of interrelated governance, administrative, financial, and political factors have collectively made housing delivery more challenging.

The interview process identified the following key themes, reflecting a range of perspectives from staff, elected officials, and regional stakeholders:

- **Rural Character Priorities:** Interview feedback suggests that some Council members place considerable weight on preserving the District's existing and important rural character. Some stakeholders noted that this can, at times, result in decisions that place community sentiment alongside or ahead of technical evidence and professional planning advice. This reflects a values tension that is common in many smaller municipalities navigating growth pressures.
- **Administrative Capacity and Consistency:** The Planning Department appears to be operating in a demanding environment with limited resources, resulting in some variability in file processing, review methodologies, and performance monitoring. These factors, where they exist, can create uncertainty for applicants and may contribute to delays. This appears to be a resource and systems challenge more than a reflection of individual performance.
- **Regulatory Predictability:** Some respondents described experiences where project requirements evolved over the course of a review, including the introduction of additional conditions after initial submissions. Where this occurs, it can increase costs and timelines and make feasibility more difficult to assess. Clearer, more standardized review processes could help address this.

- **Policy Framework and Feasibility:** Certain existing and historic District policies have been identified as potentially constraining to the viability of multi-family residential development. Examples include above average parking ratios, three-storey height limits, and disproportionate Community Amenity Contribution (CAC) expectations. Modernizing these policies to streamline approvals could help support improved housing outcomes.
- **Infrastructure Deficits and Financing Tools:** The District faces legitimate infrastructure constraints, including aging water systems, fire flow limitations, reliance on septic systems, and unresolved sewer capacity questions. However, the absence of Development Cost Charges means new development does not contribute to the cost of the infrastructure it requires, widening the delivery gap over time.
- **OCP-RGS-UCB Alignment:** There is a structural misalignment between the District's Official Community Plan and the Capital Regional District's Regional Growth Strategy and Urban Containment Boundary. Closing this gap is important for enabling sewer servicing, transit coordination, capital financing, and implementation of Provincial housing legislation. This is a foundational area that needs to be addressed to support housing supply objectives.
- **Community Opposition Dynamics:** Some interviewees noted that organized community opposition to housing, including activity through public hearings and advisory bodies, has at times made it difficult for moderate perspectives to be heard. Ensuring that public engagement processes are balanced and well-facilitated will broaden the range of voices informing decisions.
- **Market Confidence:** It appears that some consultants and developers are reluctant to engage with the District, citing past experiences with uncertain processes. Rebuilding confidence in the predictability of the development review process would support broader participation and improved housing supply.
- **Housing Type Preferences:** Interview feedback suggests that seniors housing is one of the District's more preferred types of development, which is directly in line with the needs of an aging population. Stakeholders also noted an opportunity to more explicitly address workforce and family housing needs, given the District's proximity to major employment providers.
- **Consensus on Provincial Intervention:** There is broad agreement among non-Council interviewees that achieving housing targets through voluntary measures may be challenging under current Council governance conditions. Many expressed the view that more direct Provincial involvement could help support alignment, modernize bylaws, and enhance regulatory certainty.

2.2 Official Community Plan Process

The District's OCP process evolved considerably between its inception and adoption, with the two phases reflecting different priorities and approaches. The 2022 MODUS draft identified viable locations for gentle and moderate density, grounded in structured engagement and technical analysis. The adopted 2025 OCP takes a more cautious approach in a number of areas, incorporating provisions that some stakeholders have identified as likely to constrain development feasibility.

2.2.1 Overview of OCP Review Process and Modus Resignation

For over a decade, the District operated under the 2007 OCP, which prioritized large rural estates and effectively prohibited multi-family housing, consistent with its rural designation outside the Urban Containment Boundary. In August 2020, the District retained MODUS to modernize the OCP and align policy with regional growth realities. MODUS introduced a data-driven framework supporting gentle infill, small-lot subdivisions, and logical growth nodes at the McTavish Interchange (Area 1) and Tsehum Harbour (Area 2).

The process unfolded in an environment of significant community debate, with some organized voices raising concerns about the planning direction. Public engagement reflected deeply held views on both sides, and technical recommendations were closely scrutinized throughout. The 2022 municipal election brought a shift in Council composition, with the incoming majority placing emphasis on rural preservation values. A Mayor's OCP Advisory Committee was established to help guide the OCP process, though its membership signalled a change in direction from the existing framework. In early 2023, MODUS and the District mutually concluded that the process could not continue productively, and the contract was formally terminated.

The District subsequently completed the OCP internally, during which time market feasibility emerged as an area of discussion. In summer 2025, an independent pro forma indicated that development under the proposed density and building height limits could face financial viability challenges. The District's internal pro forma reached a more optimistic conclusion, though the two analyses appear to differ in their treatment of standard residential cost inputs. Reconciling these perspectives will be important to ensure that adopted policies support viable housing outcomes.

2.2.2 Public Engagement Efforts and Findings

The public engagement process unfolded in two distinct phases, each reflecting a different methodological approach. The MODUS phase utilized structured surveys, Indigenous engagement, dialogue sessions, and verified data collection. Results indicated that a majority of respondents supported moderate, targeted growth, including gentle infill, small-lot subdivisions, and density near transit corridors. Once the District assumed responsibility for the OCP process, public engagement shifted toward advisory committee input and a narrower set of feedback channels. The perspectives that emerged during this phase leaned more toward caution regarding density. Given the

contrasting findings across the two phases, there may be an opportunity to revisit how community input is structured to better reflect the full range of local views.

2.2.3 Comparative OCP Analysis and Implications

CBRE reviewed the 2007 OCP, the 2022 MODUS draft OCP, and the adopted 2025 OCP to assess how residential land use policy evolved and where regulatory changes may either enable or deter housing supply.

Low-Density and Infill Development

This category includes subdivisions, secondary suites, and carriage houses, which represent the fastest and least disruptive path to incremental housing supply.

- **2007 OCP Baseline:** Prioritized single-family homes and large rural lots. Secondary suites and detached guest cottages were capped to restrictive sizes and largely prohibited on standard lots.
- **2022 MODUS Draft:** Created categories for Residential Infill and Small Lot Residential. It also supported small scale Neighbourhood Nooks, designed to introduce convenience-oriented retail supply. It recommended reducing minimum lot sizes (1,000m² for infill and 300m² for small lots) to facilitate infill.
- **2025 Adopted OCP:** Consolidated the above into Neighbourhood Residential and General Residential designations with constraints including minimum lot sizes of 2,833m² (~0.7 ac) to permit cottages or suites and subdivision restrictions below 1,400m² (~0.33 ac). These thresholds exclude most standard parcels.

Medium-Density Development

This land use category includes townhomes, duplexes, multiplexes, and similar forms of development. Similar to many municipalities across Vancouver Island, high land values and construction costs require developers to build enough density to offset these costs.

- **2007 OCP Baseline:** Highly restrictive regarding ground-oriented housing. The lack of designated zones forced most townhome proposals into complex spot-rezonings.
- **2022 Modus Draft:** Introduced a flexible Ground-Oriented designation, designed to act as a transition zone from single-family homes to multi-family development, in line with suburban planning best practices observed throughout Canada. It proposed viable FAR targets to ensure this sort of development could be built, given current economic realities, including heights of up to three storeys and maximum densities of 50 units per hectare.
- **2025 Adopted OCP:** Reduced permitted density to 0.6 FAR and approximately 15 units per acre (~37 units per hectare). At 0.6 FAR, most medium-density projects are unlikely to be financially viable. Comparable markets typically require 1.0–1.2 FAR with design flexibility to accommodate functional layouts and structured parking.

Multi-Family Development

This land use category determines whether the District can support complete communities and how it considers the financial realities and the need for modest multi-family development.

- **2007 OCP Baseline:** Limited multi-family development by imposing high parking requirements (2 stalls per unit), prohibitive height limits (3 storeys), and low densities of up to 16 units per acre (~40 units per hectare).
- **2022 Modus Draft:** Featured a distinct Multi-Family Residential designation, with the goal of supporting such development in areas demonstrated to have the required infrastructure capacity. It recommended modern parking ratios, modest height limits up to 4 storeys, and densities of up to 100 units per hectare.
- **2025 Adopted OCP:** Retains a hard three-storey limit (four only for seniors housing), maintains high parking ratios, and caps density at 0.8 FAR. Given current construction costs, wood-frame multi-family development in suburban markets typically requires 4–6 storeys and materially higher FARs to be feasible. Retaining high parking ratios further increases costs through unnecessary underground parking construction.

Future Growth Areas

- **2007 OCP Baseline:** Reinforced the existing UCB.
- **2022 Modus Draft:** Explored UCB expansion in Areas 1 and 2 to align growth with servicing and transit.
- **2025 Adopted OCP:** Keeps the UCB in its current location, while also allocating a significant amount of land in the McTavish area for “Future Growth”. Future Growth Areas are subject to five-year review cycles and do not appear to permit near-term densification. This limits land use certainty and creates risk for developers.

Key Implications

The comparative analysis demonstrates that the 2025 OCP includes multiple structural constraints that are likely to deter housing delivery, including:

- **Multi-family viability risk** due to low FAR, three-storey limits, and high parking requirements.
- **Gentle density suppression** through exclusionary lot size thresholds.
- **Deferred growth strategy** that designates land for future housing while preventing near-term development.

Collectively, the adopted OCP signals alignment with housing targets, although many of its regulatory constraints may limit the feasibility of delivering this housing.

2.3 Zoning and Policy Review

The District of North Saanich is currently updating its zoning by-law to address conformity with the new Official Community Plan. It is understood that Staff intend on delivering a summary of potential zoning updates to Council in Q1 2026, followed by public consultation in the Spring with goals of delivering the draft zoning bylaw to Council in April 2026.

Development within the District of North Saanich is currently governed by Zoning Bylaw No. 1255, which establishes the legal parameters for land use, building density, and site utilization across the municipality. This regulatory framework determines the feasibility of new housing projects by defining the specific conditions for buildings and their permitted uses for each parcel of land. Until the comprehensive zoning bylaw rewrite is completed and adopted by Council, all current development applications and land-use decisions remain strictly guided by the provisions of Bylaw 1255.

2.3.1 Current Zoning Bylaw No. 1255

Zoning Bylaw Definitions

As displayed in Table 1 on the following page, the definitions within Zoning Bylaw No. 1255 are heavily weighted toward a traditional, low-density, rural character that now acts as a significant obstacle to feasible housing delivery. By establishing rigid parameters for building types and occupancy, these definitions unintentionally restrict the creation of attainable housing forms intended by recent provincial mandates.

The most substantive impacts on housing viability stem from land efficiency and structural requirements, including:

- **Land Efficiency Barriers:** The definition of “Usable Open Space” requires a compact, level, and unobstructed area with no dimension less than 6.1m (20 ft.) and no slope greater than 10 percent. This requirement effectively acts as a land tax, difficult to achieve on smaller, serviced lots once standard setbacks and mandated parking ratios are applied. Similarly, the 0.99-acre minimum lot size for “Guest Cottages” effectively prohibits detached accessory suites for many homeowners, ensuring these units remain an option only on larger properties, limiting options for densifying serviced neighbourhoods.
- **Financial and Flexibility Barriers:** Structural constraints for “Carriage Houses”, specifically the requirement that they be constructed above a garage, limit design flexibility and significantly increase construction costs compared to ground-level garden suites. Furthermore, strict gross floor area caps on Secondary Suites (capped at the lesser of 90m² or 40% of habitable area) limit the ability to create multi-bedroom units suitable for families.

These overlapping definitions prioritize space-heavy, single-family formats over the smaller, more diverse housing types identified in the District’s current planning objectives. For a complete inventory of relevant zoning definitions and their specific impacts, please refer to the Appendix.

Table 1 | Multi-Family Residential Zones: Potential Challenges

Zone	Intent	Max Density	Development Considerations	Potential Challenges
Multiple Family Residential 1 (RM-1)	Townhouse development on land serviced by a community water system	2.5 units per hectare	Minimum lot size of 49.4 acres	Requires a substantial land parcel to accommodate development Low residential density compared to most traditional townhouse zones
Multiple Family Residential 2 (RM-2)	Low-density multiple-family residential on community water and sewer systems	30 units per hectare	Minimum lot size of 4,000m ² Maximum building height of 25-feet (2-storeys)	2-storey apartment development is generally unviable Significant setback, outdoor amenity space, and site coverage considerations limit developability
Multiple Family Residential 3 (RM-3)	Multi-family housing on land serviced by community water and sewer systems	Max FAR of 0.89 up to 52 units per hectare	Minimum lot size of 4,000m ² Maximum building height of 3-storeys	Significant rear setback requirement and high parking ratio. On smaller development lots, it is challenging to make development fit without moving parking underground, which impacts financial viability 3-storey apartment development is financially challenging

2.3.2 Parking Ratio Requirements

As displayed in Table 2, the District of North Saanich mandates a blanket parking ratio of 2.0 stalls per unit for all multi-family developments, a requirement that significantly exceeds adjacent municipalities and comparable municipalities across the Province. These abnormally high requirements consume a disproportionate amount of a site's buildable area, frequently necessitating expensive underground parking or larger land assemblies to satisfy both vehicle storage and usable open space requirements.

Table 2 | District of North Saanich Residential Parking Requirements

Bedrooms/Unit Type	Per Unit	Anticipated Draft
Single-Family	2.0	
Apartment	2.0	1.5 + 0.1 for visitor
Townhouse	2.0	
Guest Cottage / Carriage House	+1 space	
RM-40 (draft)	<i>Apartment</i>	1.5 + 0.1 for visitor
	<i>Independent Living</i>	1.0 + 0.1 visitor
	<i>Seniors Care</i>	0.6 per unit + 1 per 100m ²
	<i>Affordable</i>	0.75 + 0.1 visitor

Note: Anticipated draft update to parking requirements in new zoning by-law currently unconfirmed.

2.3.3 Zoning Bylaw Update

It is understood that staff have been working on an internal review of the zoning by-law to update it in alignment with current land use and long-range planning considerations outlined in the recently adopted OCP. Given capacity and expertise challenges with amending the zoning by-law in a timely manner, it is understood that McElhanney has been retained to support in the zoning by-law update.

Draft RM-40 Multiple Family Residential 40

The draft zone currently under consideration is intended to provide for multiple-family housing at a density of 40 units per acre on land served by both a community water system and a community sewer system. Within this draft zone, the maximum lot coverage being explored is 40% with a maximum development height of 11.0m for residential apartments and 14.0m for a seniors' housing facility. Additionally, the draft zone requires a substantial supply of natural space (15% of the lot area), minimum outdoor amenity space (10m² per unit, with no individual amenity area less than 80m²), and minimum indoor amenity space (2.3m² per unit for buildings with more than 15 units).

The combined requirements for mandated parking, natural space, and outdoor amenity areas create a cumulative land tax that leaves an inadequate buildable envelope once standard setbacks are applied. For a one-acre apartment project, providing 1.6 parking stalls per unit, along with 15% natural space preservation and 400m² of contiguous amenity area, forces a direct competition for ground-level space. This competition often forces expensive underground parking to be the only option to meet all requirements, which is typically unviable for a 3-storey

building. Ultimately, these site standards result in either a very small and inefficient building footprint or necessitate an exceptionally large lot to achieve the 40-unit-per-acre density intended by the zone.

Council Workshop (February 23, 2025)

Zoning Bylaw Modernization Project: Zoning Bylaw Alignment with DNS Official Community Plan 2025

Below, CBRE summarizes key observations occurring in the Council Workshop that occurred on February 23, 2025, with a focus on key proposed changes to residential zoning that are supported directly or indirectly by the new OCP.

- **Explanatory Zoning Definitions:** Staff began the presentation by explaining key terminology within the zoning bylaw, including critical elements that impact use and built-form, such as density, floor area ratio, lot coverage, and setbacks.
- **Secondary Suites:** The District is considering an increase to the maximum allowable size of secondary suites by transitioning the measurement standard from Gross Floor Area (GFA) to habitable area. Specifically, the proposal seeks to replace the current limit of 40% of GFA (capped at 968 ft²) with a new threshold of 45% of habitable area (capped at 1,238 ft²).
 - **Challenges and Considerations:** While the intent of this change is to allow for larger, more viable suites, it introduces additional complications associated with the calculation itself. Gross floor area typically includes the entire building footprint, including stairs, storage, and mechanical rooms, whereas habitable area typically excludes non-living spaces like garages and unfinished basements. Calculating the total habitable area of an existing residential building is more subjective and difficult for homeowners and staff to verify compared to a standard GFA calculation. This shift in definitions may inadvertently create regulatory uncertainty and processing delays for applicants, as "habitable space" lacks the objective simplicity of a standard floor area measurement.
- **Carriage Houses:** 65m² of second-floor living space to be supportable on a significant number of parcels in the "Terraces".
 - **Challenges and Considerations:** While an increase to 65m² of living space from 649 square feet is beneficial, there is still limited capacity for an efficient, multi-bedroom unit. Additionally, if the definition of a carriage house remains limited to the suite on the top floor of a garage, this introduces additional project costs to the development of a new infill suite on an existing property.
- **Guest Cottages:** Increased opportunity for a guest cottage in residential zones (0.7-acre lot area and above). Additional consideration to allow larger guest cottages on lots greater than 1.0 acres in size. Based on the presentation, it appears that units up to 115m² may be considered, although the presentation in its current state is unclear.

- **Challenges and Considerations:** While lowering the threshold to 0.7 acres is an improvement over the current 0.99-acre mandate, it still effectively prohibits detached accessory suites for the vast majority of homeowners in serviced residential areas. A 0.7-acre lot (approx. 30,500 sq. ft.) remains significantly larger than many of the existing serviced lots, where modest densification could be most easily supported.
- **Townhouse Residential Land Use Designation:** Based on the presentation, Staff appear to be considering amendments to permitted density, tentatively revised to 15 units/acre instead of 0.6 FAR.
- **Multi-Family Residential Land Use Designation:** Based on the presentation, Staff are considering amendments to permitted density, tentatively revised from 0.8 FAR to 40 units/acre.
 - **Challenge and Considerations:** Switching from Floor Area Ratio (FAR) to units per acre can unintentionally discourage the creation of smaller, more attainable housing units. In a FAR-based system, a developer can fit more studio or one-bedroom units within a specific building volume; however, a fixed unit cap (like 40 units/acre for multi-family developments) essentially mandates larger, more expensive individual units to maximize the building's value. This move may conflict with the District's goal of addressing specific housing gaps, such as smaller units for seniors or young families.
- **Parking Requirement Revisions:** Staff are exploring the opportunity to revise parking rates for multi-family residential and townhouse residential zones from 2 spaces per unit to 1.5 spaces per unit, plus an additional 0.1 spaces per unit for visitor parking and 3% accessible spaces in projects where more than 10 spaces are required.
- **Commercial and Residential Mixed Use:** Staff's presentation notes that there may be new opportunities for commercial and residential mixed-use development at key locations.

2.3.4 Key Implications

Density and Land Use

- **Infill Density Constraints:** Current regulations prohibit a property from hosting both a secondary suite and a carriage house, preventing the creation of mortgage helpers or multi-generational housing on single-family lots.
- **Restrictive Infill Typology:** Carriage house definitions are limited to garage-top units, which restricts total livable area and prevents the use of a ground-level urban laneway typology.
- **Prohibition of Lock-off Suites:** Townhouse and apartment definitions preclude the inclusion of secondary suites, removing a key tool for homeowners to offset costs through rental income.

- **Co-Housing Barriers:** The definition of "family" limits households to a maximum of two to four unrelated persons, serving as a regulatory barrier to communal living and co-housing models.

Multi-Family Barriers

- **Height-Induced Unviability:** The 7.6m (25 ft.) height limit in the RM-2 zone functionally restricts buildings to 2-storeys, which is generally unviable for apartment forms and lacks the density to align with financial viability.
- **RM-3 Siting Constraints:** The RM-3 zone requires a 15m (49.2 ft.) rear setback, which can utilize a substantial portion of a development site and renders new apartment development challenging.
- **Parcel Requirements (RM-1):** Townhouse development in the RM-1 zone requires a minimum site size of 20 hectares (49.4 acres), a density allocation that prevents any significant development from occurring.

Parking and Site Considerations

- **Undifferentiated High Parking Ratios:** The bylaw mandates a blanket 2.0 parking stalls per unit for both apartments and townhouses, with no differentiator for unit size.
- **Usable Open Space Requirements:** For multi-family zones, the bylaw mandates a significant amount of usable open space that cannot include parking areas, driveways, or required front yards. Given the scale of usable open space required to permit development and the balance between land requirements for parking, the building footprint, setbacks, access, and outdoor space, these requirements necessitate either larger land parcels or underground parking.
- **Forced Underground Parking:** The competition for ground-level space between mandated open space and high parking ratios often forces parking underground, which is limited by height restrictions and can significantly impact the financial viability of a project.

2.4 Airport Review

In the 2023 – 2042 Victoria Airport Authority Master Plan, there are no indications that residential uses of any format or tenure will be supported on any of the airport lands. The Development Guidelines and Land Use Guidelines (June 2024) do not support residential development of any kind on airport lands.

The Victoria Airport Authority (VAA) is a not-for-profit corporation responsible for the management, operation, and development of the Victoria International Airport (YYJ) under a 60-year ground lease from Transport Canada. As a key regional economic hub, the VAA oversees approximately 1,000 acres of land dedicated to aviation-related industry, aerospace technology, and supporting commercial enterprise.

Legally, the airport operates under Federal jurisdiction, governed primarily by the Aeronautics Act. This status invokes the doctrine of federal paramountcy, which dictates that where a conflict exists between valid Federal and Municipal regulations, the Federal mandate prevails. As a result, the VAA has the authority to override any local or provincial planning and policy mandates as required to ensure the continued operation and growth of a national transportation asset.

2.4.1 Victoria Airport Authority Master Plan

The Victoria Airport Authority (VAA) Master Plan (2023-2042) provides the long-term strategy for the development of the airport as required by the Transport Canada Ground Lease. The Victoria Airport Authorities Land Use Plan (September 2025) clearly states that residential uses are not permitted across all land uses and is a general policy statement across the land use plan.

- **Airside Land Use Designation:** Uses that require direct access to the airfield. Residential uses are not permitted.
- **Groundside Mixed Use:** Aviation-related, aviation-dependent, aviation compatible. Permitted uses include hotels, office, retail, F&B, and light industrial. Residential uses are not permitted.
- **Airport Reserve:** Lands protected for long-term airport use are not required within the planning period. Residential uses are not permitted.
- **Mixed-Use Designation:** Allows for a mix of compatible uses that support the airport's long-term operational, economic and transportation goals. These mixed designations provide the flexibility to accommodate future growth and operational growth and ensure land efficiency by maintaining the flexibility to respond to changing aviation, commercial, and infrastructure needs. Residential uses are not permitted.

Ultimately, there is nothing in the Victoria Airport Authority Land Use and Development Guidelines that gives an indication that residential uses would be supported on any of the airport lands.

2.4.2 Victoria Airport Authority Engagement

Jurisdictional Conflict and OCP Alignment

There is a fundamental planning conflict between the District's Official Community Plan (OCP) and the Federal jurisdiction governing the Victoria Airport lands. While the District has designated these lands for multi-family residential and commercial development, these designations contrast directly with the Victoria Airport Authority (VAA) Master Plan, which excludes residential uses. This misalignment has prompted formal intervention from Transport Canada, which requested OCP amendments to accurately reflect Federal jurisdiction and existing land-use constraints.

Divergent Housing Policy Visions

A significant strategic gap exists regarding the Airport's role in housing delivery. District Stakeholders have suggested that the VAA could model residential development on examples such as Burkeville at the Vancouver Airport; however, the VAA has formally clarified that it does not have a mandate to support municipal or regional housing targets. The VAA has requested that future planning documents explicitly state that the Airport has no role in meeting regional housing needs to avoid further public ambiguity.

Communication and Procedural Friction

The divergence between municipal planning designations and Federal operational realities has created a challenging public narrative towards the VAA. While professional staff-to-staff engagement remains functional, there are ongoing challenges at the Council level. Specifically, significant long-range planning announcements regarding the Airport have frequently been communicated via media releases rather than through a collaborative policy-creation process, complicating inter-agency relations.

2.4.3 Key Implications

The relationship between the District of North Saanich and the Victoria Airport Authority is a critical factor in regional infrastructure stability and long-term regional economic development.

- **Position and Role in Housing:** The VAA has made clear its position that it does not have a role to play in supporting municipal or regional housing targets. The Victoria Airport Authority has formally requested that the District amend the current planning documents and that future planning documents explicitly state that the airport has no role in meeting new housing needs in the region.
- **Infrastructure Interdependency:** The VAA seeks greater collaboration opportunities with the District, recognizing that there is a symbiotic relationship with the Airport, particularly when it comes to infrastructure servicing. Presently, much of the servicing that supports neighbourhoods such as Deep Cove have infrastructure passing through critical airport lands.

2.5 SSMUH and UCB Review

The BC government introduced Small-Scale, Multi-Unit Housing (SSMUH) legislation to address the housing crisis by removing restrictive zoning barriers and increasing the supply of attainable, ground-oriented homes for middle-income families. The goal of this legislation is to enable a gradual uptake of multi-unit housing, allowing neighbourhoods that are predominantly characterized by single-detached and duplex homes to gradually adapt to increased density while creating more diverse and inclusive communities.

Small-scale, multi-unit housing (SSMUH) describes a range of building and housing formats, such as duplexes, triplexes, and rowhouses, that aim to provide attainable housing for middle-income families. By introducing "missing middle" density into traditional residential areas, SSMUH policies seek to bridge the gap between single-family homes and high-density apartments. This approach provides a greater diversity of housing options that are more compatible with the scale of established neighbourhoods while utilizing existing infrastructure more efficiently.

2.5.1 SSMUH Policy and Development Considerations

- **Urban Containment Boundary Relationship:** Only parcels within the urban containment boundary established by the Capital Regional District's (CRD) Regional Growth Strategy would have to meet the SSMUH zoning requirements for three, four, or six units. The District of North Saanich needs to align with the UCB to support intensified growth and provincial housing objectives. If a local government's land falls within an urban containment boundary established by a regional growth strategy, that urban containment boundary is the determining factor regarding where SSMUH requirements apply.
- **Regulatory Alignment:** Legislation prohibits local governments from unreasonably restricting or prohibiting small-scale multi-unit housing.
 - Local governments can set form and character requirements through Development Permit Areas in areas where SSMUH requirements apply. However, they must not unreasonably restrict the ability to use land at the use or density prescribed by SSMUH legislation.
 - Local governments may exempt areas due to geotechnical hazards and environmental challenges; however, they must have a report prepared by a qualified professional in order to gain exemptions.
 - Local governments must not hold a public hearing for zoning bylaw updates that are for the sole purpose of complying with SSMUH legislation.

2.5.2 SSMUH Areas via UCB Expansion

McTavish Exchange (Area 1)

- **Bus Frequency:** The McTavish Exchange currently services bus routes 70, 70X, 71, 72, 81, 87, 88, and 88A.
- **Impact:** Based on current frequency, the existing bus routes do not classify as frequent bus service routes.
- **SSMUH Density:** Should bus service frequency increase and the area around the McTavish Exchange be included within an Urban Containment Boundary, the allowable SSMUH density would increase from 3-4 units to 6 units per single-family and duplex residential lot.

Tsehum Harbour (Areas 2) and Southeast Quadrant (Area 3)

- **UCB Expansion:** If the urban containment boundary was extended to include Tsehum Harbour (Area 2) and the Southeast Quadrant (Area 3), these areas would be legally required to support development up to 4-units through SSMUH development policy.
- **SSMUH Density:** The allowable SSMUH density would increase from 3-4 units to 6 units per single-family and duplex residential lots should transit frequency improve.
- **Infrastructure Capacity:** The proximity of Tsehum Harbour to Sidney's utility network, combined with the infrastructure capacity in the Southeast Quadrant and the potential redevelopment of the Allegro School site, should create a viable environment for infill and redevelopment. These factors provide the servicing framework to support SSMUH-aligned density as the node undergoes long-term change and gentle growth.

2.5.3 Key Implications

- **Permitting SSMUH:** The District of North Saanich's Urban Containment Boundary needs amendment in alignment with the Capital Regional District's regional growth strategy to enable SSMUH beyond secondary suites and accessory dwelling units.
- **Key Challenge:** The Regional Growth Strategy (Bylaw 4017) characterizes the Urban Containment Policy Area as a stable, long-term boundary, with amendments generally restricted to a comprehensive five-year review cycle, although it recognizes that municipal councils and the CRD Board are free to initiate, at any time, amendments to official community plans and the regional growth strategy as they deem necessary. Therefore, expanding the Urban Containment Boundary is likely to be classified as a Major Amendment to the Regional Growth Strategy (RGS). A major amendment requires unanimous support from all 13 municipal councils in the Capital Regional District. Under the Local Government Act (LGA), if a single municipality refuses to accept the amendment, the process triggers a mandatory dispute resolution process. Historically, this has allowed the District of North Saanich to effectively block UCB expansions, as any misalignment between the District's Council and the CRD's regional objectives can stall the amendment indefinitely.

2.6 Development Applications Review

Through a detailed review of pre-applications and active development applications, along with interviews with those involved in many of these projects, it is clear that housing underperformance in North Saanich often stems from governance fragmentation, administrative capacity constraints, and policy obstruction rather than a lack of market demand.

2.6.1 Pre-Applications

Throughout the interview and data collection process, it became evident that the District lacks a standard protocol for tracking pre-application inquiries. Following interviews with planning staff, the District provided a table representing the aggregate unit counts for both active development applications and preliminary inquiries, summarized as follows:

Table 3 | District of North Saanich Active Development Applications and Preliminary Inquiries

Format	Units
Single Family Residential Houses	48 new units
Carriage Houses	7 units
Guest Cottages	5 units
Secondary Suites	7 units
Townhomes	104 units
Multifamily Residential	330 units (not including the Master Plan described below)
Total Active DPs and Preapplication Units	501 units (combined active applications and inquiries)

This data appears to represent the full extent of the District's current tracking capabilities regarding pre-applications. By subtracting the active development application totals outlined in Section 2.6.2, approximately 368 units (representing 73% of the total) remain in the pre-application phase and have yet to advance to a formal application stage.

It should be noted that this internal tracking data appears incomplete and does not account for significant potential housing supply currently being considered as development applications that may be submitted in the future. For example, it does not include the 900-unit master-planned community proposal. Below, CBRE outlines notable potential projects, along with a townhouse project that has been delayed since 2022.

- **McTavish Master Plan | Aryze Developments (2026):** The proposed development at 1579 McTavish Road advances provincial housing objectives through a partnership-driven approach, delivered in joint venture

with the Pauquachin Nation. The project brings forward approximately 900 homes across a diverse mix of rental, seniors-oriented, market condominium, and townhome tenures, alongside roughly 30,000 square feet of neighborhood-serving commercial space. Designed to address a substantial portion of the District's housing needs in a single coordinated phase, the proposal integrates public open space and amenities that support complete community and aging-in-place principles, demonstrating how policy alignment and Indigenous partnership can unlock significant housing supply while delivering broad community benefits.

- **Seniors Housing Development | Private Developer (2026):** Searching for 15 acres of land within the District, representing a good test case for its capacity to fulfill its housing mandates. While yields are being finalized, early engagement indicates that District staff are actively assisting in identifying suitable, serviceable land for this project.

Section 12 (Policy Advice/Recommendations), Section 22 (Personal)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2.6.2 Active, Delayed, and Recently Rejected Applications

Throughout the review and data collection process, CBRE analyzed the District's active development pipeline and identified several projects, as outlined below. Table 4 provides a high-level summary of these projects. Following this summary, CBRE provides a detailed profile of key projects.

Table 4 | Notable Active, Delayed, and Recently Rejected Applications

Address	Type	Description	Units
8650 Aldous Terrace	Active Rezoning	Rezoning to enable the subdivision into two lots	1 new single-family unit
11307 Chalet Road	Active Subdivision	Subdivide the parcel into two lots, retaining the existing house on the front lot	1 new single-family unit
9064 East Saanich Road	Active Subdivision	Proposed subdivision of the western portion of the parcel located outside the ALR	38 new single-family units
10612/10622 McDonald Park Road	Active OCP Amendment and Rezoning.	OCP Amendment and Rezoning application to allow a six-storey residential building	92 new multifamily units
8511 Bexley Terrace	Rejected Subdivision	Subdivide the parcel into two lots, retaining the existing house on the front lot	1 new single-family unit
Total			133 new residential units

- **8650 Aldous Terrace | Proposed Subdivision (Application in 2019):** This is a residential subdivision application to create one additional lot within the existing property. The owner first applied to subdivide in August 2019, receiving 1st and 2nd readings from Council in January 2020, with support from the neighbourhood and Community Planning Commission. The application was subsequently reconsidered in October 2021, at which point the earlier readings were not carried forward. A second application was submitted in November 2024, and in September 2025 Council granted 1st, 2nd, and 3rd reading, conditional on the registration of a restrictive building covenant on title prior to 4th reading. Finalization of that covenant remains outstanding, and the 4th reading will proceed once it has been registered. As a result, the subdivision process has been ongoing since 2019.

- **10612 / 10622 McDonald Park Road | Proposed Multifamily Development (Application in 2025):** Representing one of the more significant near-term housing supply opportunities in North Saanich, this project is currently pending resolution of several policy and procedural matters. Key considerations raised by Council and staff include building height and massing, with discussion around the proposed six-storey form, as well as parking requirements that may affect project viability. In parallel, there is an outstanding governance question regarding the Urban Containment Boundary, as the lands are designated for urban uses in the District's planning framework but are not fully aligned within the CRD's UCB. Collectively, the height, parking, and UCB alignment questions remain under consideration, and their resolution will be an important step toward advancing a project with meaningful potential to contribute to local housing supply.

- **8511 Bexley Terrace | Rejected Subdivision (Rejected in 2024):** This application involved a proposal to subdivide a 0.52-ac property in North Saanich's Southeast Quadrant into two approximately 0.26-ac lots, intended to allow the owner's son to build a retirement home adjacent to his 85-year-old mother, enabling her to age in place with family support. The proposal represented a modest, gentle density addition within an established single detached area. A District staff report dated June 17, 2020, supported the subdivision; however, Council did not approve the application. A second application was subsequently submitted, and following a staff report dated July 8, 2024, which did not support the proposal, it was not approved. This file illustrates some of the considerations that can arise with small-scale infill subdivisions in North Saanich, particularly as the District continues to navigate provincial housing direction and ongoing housing supply pressures.

2.7 Development Capacity Review

This section evaluates the District's infrastructure readiness and the policy frameworks required to support population growth through new residential developments. The goal is to identify the specific technical and financial shifts needed to align municipal servicing capacity with long-range growth targets and ensure consistency and replicability within the development approvals process.

The District of North Saanich has traditionally cited a lack of infrastructure capacity as a primary rationale for not supporting new development applications in the area.

2.7.1 Infrastructure Capacity – Plans and Policy

- **Capacity Considerations:** The District of North Saanich maintains a policy of non-support for development applications in the absence of confirmed servicing capacity, codified in long-range planning documents. However, because comprehensive modelling and long-term investment in system upgrades have been limited, the actual residual capacity of water and sanitary sewer systems remains an unknown variable, which delays the review and approval process for new applications.
- **Sewer and Water Master Plan:** The District is in the process of developing a new Sewer and Water Master Plan and a Water System Master Plan, which will create a better understanding of current infrastructure capacities and identify infrastructure deficiencies and limitations across the municipality. Additionally, the master plan is expected to inform a new development cost charge bylaw, which will allocate costs to new developments regarding infrastructure requirements needed to service a growing population and intensified new development.
- **Development Cost Charge Policy:** Unlike most other major municipalities across the Province and the region, the District of North Saanich has been historically reluctant to enact a development cost charge (DCC) policy to recoup fees from new development projects to improve localized infrastructure capacities.

2.7.2 Key Implications

- **Predictability and Financial Replicability:** To support new housing development as mandated by the Province, the District needs to transition to a market-aligned, bylaw-based Development Cost Charge (DCC) policy to support infrastructure capacity. Replacing ad hoc cost negotiations for infrastructure with a clear, consistent fee structure enables applicants to incorporate infrastructure costs into their initial financial modelling. This level of transparency is essential to creating a predictable environment in which new development projects are financially viable and replicable across the municipality. By providing upfront costing certainty, a formal DCC policy enables developers to accurately assess residual land values and

future sale price points and rental rates, ensuring that various development formats are market-feasible rather than just theoretically permitted.

- **Prioritizing the Infrastructure and Services Master Plan:** Historically, the District has navigated a "chicken-and-egg" scenario where development applications are deferred due to a lack of confirmed infrastructure capacity, yet the comprehensive studies needed to resolve those unknowns have not been prioritized. Formalizing and adopting the sewer and water master plan breaks this cycle by providing the baseline data needed to proactively assess development impacts, preventing infrastructure from being used as a passive tool to stall policy-aligned applications.

2.8 Organizational Review

This section examines the administrative and organizational capacity of the District of North Saanich, with a focus on the Planning Department. A municipality's ability to meet housing targets is closely tied to its human capital, organizational stability, and the internal processes that support decision-making.

2.8.1 Staff Turnover Analysis

Based on a review of human resources data provided by the District, it appears the Planning Department has experienced notable staff turnover, particularly in leadership and planning roles important to housing delivery. Since 2022, the majority of planning staff have transitioned out of the District, which has had a notable impact on departmental capacity and continuity in supporting new housing development. Key findings include:

- **Loss of Senior Leadership:** The District experienced transitions in senior leadership, including the departure of the Director of Planning and Community Services in February 2023, followed by the CAO in June 2023. These transitions occurred during an important phase of the OCP review process. More recently, the Manager of Planning position has been unavailable to participate in interviews conducted for this report, and contact information for this role has since been removed from the District's website.
- **Loss of Senior Planners:** The Senior Planner acting as project lead for the MODUS OCP update departed in June 2022. The Senior Planner, subsequently leading the District's OCP update, also departed in May 2024, reflecting the broader staff transitions the department has experienced during this period.
- **Administrative and Support Staff Turnover:** The data indicates considerable turnover among auxiliary and permanent support staff, with over 15 administrative assistants, committee clerks, and planning technicians having transitioned out of or completed short-term contracts with the District since 2022. This level of turnover in administrative support roles can place additional demands on senior staff, which may contribute to delays in the processing of complex housing files.

2.8.2 Operational Capacity Analysis

While the District has made efforts to increase staffing capacity, including the addition of a 1.0 FTE Planner in 2025 and a Manager of Building and Bylaw in 2022, operational capacity has been affected by extended absences and legacy systems.

- **Extended Leaves of Absence:** The department's operational capacity, including progress on key projects such as the Zoning Bylaw update, has been affected by several extended leaves of absence. These include a Planning Technician absent for 18 months (September 2023 to March 2025) and a Senior Planner absent for 5 months (March to August 2024). As noted above, the Manager of Planning position has also been unavailable since December 2025.

- **Management Capacity:** With the Manager of Planning position currently unavailable, the Director of Planning appears to have assumed additional responsibilities. Feedback gathered through interviews suggests that the expanded scope of these responsibilities has, understandably, at times affected the Director's availability and capacity to provide oversight in some areas. As a result, junior planners may be operating with limited structured supervision and formal onboarding support.
- **Third Party Consultant Hires:** In response to departmental capacity considerations and the importance of the Zoning Bylaw update, CBRE was advised in late February 2026 that the District has engaged McElhanney to assist with this process. This is a welcome development that is expected to support the timely completion of the Zoning Bylaw update.
- **Technological Capacity:** Staff capacity appears to be further affected by the District's reliance on legacy file management systems such as DocuWare. Feedback from interviews also suggests that standardized operating procedures for reviewing applications may be limited in some areas, contributing to variability in processing timelines.

2.8.3 Culture and Decision Analysis

Interviews with current staff, former staff, elected officials, and active developers suggest that organizational and procedural dynamics have at times presented challenges in the processing of development applications. These dynamics appear to exist at both the administrative and political levels and may contribute to complexity in the review and approval of development applications.

- **Administrative Considerations:** Feedback gathered through interviews suggests that the Planning Department has faced leadership and organizational challenges during this period of transition. It is recognized that many of these challenges may be attributable to the cumulative pressures of staff turnover and capacity constraints rather than the capabilities of senior leadership. Some staff have indicated that workload pressures and file management processes have at times created a stressful work environment.
- **Political Considerations:** Council decision-making appears to be influenced by a strong rural preservation perspective among some members. It is recognized that community engagement and the representation of resident interests are important parts of the municipal decision-making process. However, feedback from interviews suggests that balancing these perspectives with technical data and professional staff recommendations has posed challenges in advancing some housing applications.
- **Reputational Considerations:** The District's experience with external consultants and the staff transitions outlined above may have presented some challenges in attracting and retaining qualified planners and external consultants. It is recognized that these dynamics can be self-reinforcing, as organizational capacity and external perceptions are closely linked. That said, the recent engagement of McElhanney is a positive step that may help to rebuild external confidence and support the delivery of key planning work.

2.9 Comparative Municipality Review

This section assesses neighbouring CRD municipalities to identify the specific strategies and policies they adopted to meet Provincial housing targets. The goal is to highlight the policy initiatives used to support development and align future growth with long-range policy in targeted areas.

2.9.1 Town of Sidney

The Town of Sidney has concentrated the majority of its intensified residential and mixed-use development within its downtown core to ensure efficient growth while protecting the character of established residential neighbourhoods. By prioritizing sensitive infill and secondary suites, the Town has created a framework for densification that aligns with Provincial requirements while maintaining its unique community fabric. Some of the recent actions and priorities the Town of Sidney has adopted are as follows:

Table 5 | Town of Sidney Comparative Review

Action	Approach
Delegated Approval Authority	As per the land use procedures bylaw (1380), the Director of Development Services may approve and issue a Development Permit (minor). The intent of this is to allow Staff and Council to focus capacity on reviewing more significant development and rezoning applications.
Zoning Amendments and OCP Alignment	The Town of Sidney recently updated the Zoning Bylaw to comply with Bill 44 requirements, including amendments to support SSMUH development. Additionally, the zoning bylaw update included pre-zoning in new areas for multi-unit residential development in alignment with the amended OCP.
Early Adoption of Infill Development	The Town of Sidney was one of the first municipalities in British Columbia to legalize secondary suites in almost all single and two-family residential zones and to allow higher-density small-lot housing throughout some residential neighbourhoods. The goal of this was to enable the sensitive creation of additional housing opportunities in existing neighbourhoods without fundamentally impacting the form and character of established communities.

2.9.2 District of Central Saanich

The District of Central Saanich has concentrated more intensive forms of development within its UCB areas to ensure that specific areas of the community are protected and enhance its rural and small-town character. This focus is reinforced by the adoption of Zoning Bylaw No. 2180 (2024) and OCP #2100, which facilitate expanded SSMUH options and introduce Residential Infill Design Guidelines for sensitive densification. Growth is directed toward the Saanichton and Brentwood Bay Village Centres, where supportable building heights have been increased to 6 storeys to encourage walkability. To improve delivery, the District has streamlined the development process through the Delegation of Authority Bylaw (No. 2060) and updated Public Hearing requirements to align with Bill 44 and prioritize housing that addresses identified community needs. Notable recent actions are highlighted below:

Table 6 | District of Central Saanich Comparative Review

Action	Approach
SSMUH Zoning Amendments	The District's new zoning bylaw (No. 2180, 2024) was recently adopted to allow more housing units on a property, including secondary suites, detached cottages, and carriage houses, and amended to align with OCP land use policies to support SSMUH options both within and outside the UCB.
Residential Infill Design Guidelines	In conjunction with the zoning update, the District adopted Residential Infill Design Guidelines in Schedule A of the new Official Community Plan (OCP #2100, April 2023) to help incorporate more types of housing sensitively in the community.
Village Centre Densification	The new OCP designated lands within Saanichton and Brentwood Bay for higher-density residential development and a density bonus framework. Maximum supportable heights were increased from 4-storeys to 5 or 6-storeys to enhance walkability and support 6-storey wood-frame apartments.
Prioritized Application Processing	The District approved a policy in August 2025 to prioritize applications for non-market housing and for projects that address gaps identified in the Housing Needs Assessment report. This signifies an acknowledgement of housing needs over a first-come, first-served approach.
Delegated Approval Authority	The Delegation of Authority Bylaw (Bylaw 2060) allows the Director of Planning and Senior Staff to process and approve conforming development permits, thereby reducing the number of

projects requiring a formal Council vote and public input, with the aim of reducing development timelines.

UCB Growth and Intensification

The District is prioritizing infill development and densification in areas already serviced within the UCB, particularly in nodes designated for multi-family and mixed-use development.

Streamlined Public Hearings

Public hearings may no longer be held when the zoning bylaw amendment aligns with the OCP, and the zoning bylaw amendment is intended to facilitate residential development where at least half of the gross floor area of all buildings in the development is designated for housing. The intent of this bill is to reduce ambiguity in assessing development applications, particularly for projects that align with long-range planning policy, which ultimately reflects the publicly approved long-range vision for growth outlined in the OCP.

2.9.3 Residential Parking Requirements

Residential parking mandates represent a primary lever for determining housing viability and land use efficiency throughout the Greater Victoria region. While regional peers have increasingly adopted reduced or variable parking ratios to incentivize diverse housing types, North Saanich continues to use more rigid requirements that can increase capital costs and limit overall site potential.

Table 7 | City of Colwood Multi-Family Parking Requirements

Bedrooms	Urban Centre	Other Areas
Bachelor	0.8	1.0
1-Bedroom	1.0	1.25
2-Bedroom	1.3	1.6
3+ Bedroom	1.5	2.0
Triplex, Townhouse, Rowhouse	1.5	2.0
Visitor	0.15	0.15

Note: No visitor parking required for mixed-use multi-family

Table 8 | Sidney Residential Parking Requirements

Bedrooms/Unit Type	Ratio	Note
Seniors' Housing	0.75 per bedroom	
Apartment	1 per unit	
Secondary Suite	1 per suite	
Single-Family	1 per unit	Recently reduced from 2.0 per unit
Townhouse	1 per unit	
Duplex	1 per unit	

Table 9 | Central Saanich Residential Parking Requirements:

Bedrooms/Unit Type	Per Unit	Visitor
Residential Attached	1.5 (see note)	0.1
Residential Apartment	1.5 (see note)	0.1
SSMUH	1	0

Note: Off-street parking bylaw is currently being updated. Recent amendments include:

- 1-stall per unit for residential projects less than 12 units
- Maximum of 1.5 stalls per unit for projects with more than 12 units

2.9.4 Residential Subdivision and Minimum Lot Standards

Minimum lot standards for residential subdivision projects are a primary factor in determining the feasibility of residential infill and the overall efficiency of serviced land use. While neighbouring municipalities utilize smaller, serviced lot formats to facilitate diverse housing types, North Saanich maintains significantly larger minimum lot requirements that often act as a barrier to the densification intended by Provincial legislation.

Table 10 | District of North Saanich Subdivision and Lot Standards:

Zone	Minimum Lot Size	Minimum Lot Width
Single Family Residential 1 (R-1)	1,400m ²	26m
Single Family Residential 2 (R-2)	2,000m ²	26m
Single Family Residential 3 (R-3)	4,000m ²	46m
Small Lot Single Family Residential 1 (RS-1)	1,000m ²	19

- Note: Anticipated draft update to by-law currently in progress in partnership with McElhanney.
- Note: Subdivision req. for small lot single family, as per bylaw, contingent on full access to servicing.

Table 11 | Town of View Royal Single-Family Zoning:

Zone	Minimum Lot Size	Minimum Lot Width
R-1 Detached Residential (Large Lot)	1,000m ²	17.5m
R-1A Detached Residential	850m ²	17.5m
R-1B Detached Residential (Medium Lot)	600m ²	15m
R-1C Detached Residential (Small Lot)	360m ²	12m

Table 12 | Town of Sidney Neighbourhood Residential Zoning:

Zone	Minimum Lot Size	Minimum Lot Width
R1	250m ²	7.5m
R1-ESA	500m ²	7.5m
R2	500m ²	-
R2-ESA	4,000m ²	-
R3	350m ²	7.5m

Note: Neighbourhood residential zone is the lowest-density residential zone in Sidney

Table 13 | District of Central Saanich Neighbourhood Residential Zoning:

Zone	Minimum Lot Size	Minimum Lot Width
Residential Neighbourhood (R-N) Small Lot	Less than 280m ²	22m
Residential Neighbourhood (R-N) Large Lot	Over 280m ²	22m

Note: Residential neighbourhood is the most applicable single-family residential zone (non-rural agricultural lots). Minimum lot area for subdivision is 750m² and minimum frontage for new lots is 22m.

2.9.5 Accessory Dwelling Units and Multiple Secondary Suites

The regulation of Detached Accessory Dwelling Units (ADUs) varies significantly across the region, with most municipalities removing minimum lot size barriers to encourage diverse housing options. While regional peers increasingly permit both a secondary suite and a detached ADU on a single lot to maximize land efficiency, North Saanich's current and proposed thresholds remain considerably more restrictive than found in neighbouring jurisdictions.

Table 14 | Accessory Dwelling Units and Multiple Secondary Suites Comparative Analysis

Municipality	Minimum Lot Size for Detached ADU	Secondary Suite + Carriage House
City of Colwood	N/A	Up to 1 secondary suite and one ADU per lot
District of Saanich	N/A – size of ADU varies depending on lot size	Permitted within the UCB
View Royal	Dependent on the zone, supportable above 360m ² lot size.	Garden suites and secondary suites permitted on a single lot
District of Central Saanich	N/A	Permitted within the UCB
Town of Sidney	(N/A) inside neighbourhood residential	Permitted within the UCB

2.9.6 Variance Thresholds

To provide a predictable framework for administrative approvals, several adjacent municipalities have adopted specific thresholds to define "minor" variances. These standards allow staff to process and approve minor deviations from zoning requirements, ensuring that technical challenges on constrained sites do not unnecessarily trigger a lengthy political review. The District of Saanich utilizes a 10% threshold for lot coverage, whereas the Municipality of North Cowichan utilizes the more progressive thresholds detailed below to unlock difficult infill sites:

Table 15 | Municipality of North Cowichan Variance Thresholds

Type of Variance	Maximum degree of variance to be considered a minor variance
Yard Setback	50% reduction
Minimum Lot Size	25% reduction or 200m ² reduction (whichever is less)
Min. Lot Size (Existing Underweight Lot)	25% reduction or 100m ² reduction (whichever is less)
Lot Coverage	25% increase
Lot Frontage	25% decrease

Projections (into a required setback)	50% increase
Building Height	1 metre
Minimum Number of Parking Spaces	35% reduction
Other Off-Street Parking Provisions	Any variance
Off-Street Loading	Any variance
Fences/Retaining Walls (Combined)	Any variance
Fences (without retaining walls)	25% height increase
Waste Enclosures (Garbage/Recycling)	Any variance
Landscaping and Screening	+/- 25% of standard
Sign Dimensions, Height, or Setback	+/- 25% of standard

2.9.7 Key Implications

Based on the comparative findings from the Town of Sidney, the Town of View Royal, the Municipality of North Cowichan, and the District of Central Saanich, the following key implications for the District have been identified.

- **Delegation of Authority and Approval Discretion:** A significant gap exists between the District of North Saanich and its neighbouring municipalities regarding approval timelines and certainty. While the District of Central Saanich and the Town of Sidney have successfully delegated authority to the Director of Planning for conforming or minor development permits, the District of North Saanich continues to maintain a high level of discretionary oversight. While the District of North Saanich does have delegated authority for development permits, it does not appear to use it. The District of North Saanich's Development Applications Procedures Bylaw No. 1519, Section 8, Delegation of Authority, delegates the Director of Planning to issue and amend Development Permits in respect of all Development permit areas established by the Official Community Plan. Under Section 8.1(b) of this bylaw, the Director of Planning may not issue or amend a development permit that varies any provision of any bylaw.
- **Design Alignment and Approvability:** The District of Central Saanich's adoption of residential infill design guidelines provides a template for DNS to address local opposition to density. By codifying clear expectations for form and character, the District provides applicants with the upfront certainty that their proposals align with the community's long-term vision. Simultaneously, this framework helps mitigate neighbour opposition by ensuring that new density remains sensitive to the established character of existing neighbourhoods, effectively replacing regulatory ambiguity with predictable, objective design standards.
- **Urban Containment Boundary Focused Growth:** While neighbouring municipalities use the Urban Containment Boundary (UCB) as a strategic tool to focus intensification in established nodes, the District of North Saanich's current UCB alignment acts as a de facto barrier to the higher-density forms of SSMUH. While the District is currently meeting Provincial requirements, without amending the UCB to include serviced areas such as Tsehum Harbour or the Southeast Quadrant, the District remains in a regulatory stalemate that prevents the higher-density 3-to-6-unit forms intended by Provincial legislation.

- **Approvals Standardization:** The District of North Saanich must transition from a model of site-specific negotiation to one of regulatory certainty, ensuring that the publicly approved vision in the OCP (pending potential amendments), rather than individual discretionary decision-making by Council, is the primary driver of approving new development projects.
- **Provision of Residential Parking:** The District of North Saanich currently mandates a blanket parking ratio of 2.0 stalls per unit, which significantly exceeds the requirements of neighbouring municipalities such as the Town of Sidney (1.0 stall per unit) and Central Saanich (1.0 to 1.5 stalls per unit). These abnormally high requirements consume a disproportionate share of a site's buildable area and frequently force developers to resort to expensive underground parking or larger land assemblies to satisfy both vehicle storage and mandated open space requirements. While the anticipated draft update to 1.6 stalls per unit (including visitors) is a notable reduction, it remains less flexible than the project-specific and urban-centre ratios that regional peers have successfully used to improve housing viability.
- **Subdivision and Lot Standards:** The District of North Saanich maintains significantly larger minimum lot size and width requirements compared to neighbouring municipalities, which limits the potential for sensitive infill and small-lot development. While the Town of Sidney and the District of Central Saanich have adopted lot sizes as small as 250m² to 280m² to facilitate diverse housing types, North Saanich's R-1 and R-2 zones require 1,400m² to 2,000m², respectively. This discrepancy keeps serviced land underutilized and prevents the creation of smaller, more attainable lot formats that regional peers are successfully using to meet Provincial housing targets.
- **Detached Accessory Dwelling Unit (ADU) Flexibility:** Neighbouring municipalities such as the City of Colwood and the District of Saanich have largely removed minimum lot size requirements for detached ADUs to facilitate flexible infill development. While peers like View Royal permit both secondary suites and garden suites on lots as small as 360m², North Saanich continues to utilize significantly higher land size thresholds that limit the potential for infill development. Adopting a more context-sensitive approach to ADU lot minimums could reduce the burden on existing infrastructure while unlocking significant infill potential that aligns with the District's semi-rural character.
- **Variance Thresholds and Approval:** The District lacks the objective, quantitative variance thresholds utilized by regional peers to distinguish between minor technical adjustments and significant policy deviations. While the District of Saanich and the Municipality of North Cowichan have adopted progressive thresholds, including North Cowichan's 50% yard setback reduction and 25% lot coverage increase to unlock difficult infill sites, the District of North Saanich maintains a process in which even minor technical variances can trigger a fulsome review. Establishing similar variance thresholds would provide applicants with the upfront certainty required to pursue missing-middle housing on constrained lots, effectively shifting routine technical decisions from Council to a more efficient and consistent review process.

2.10 Housing Forecast Review

This section examines the District's short-term and long-term housing projections in the context of market conditions, administrative capacity, and the development pipeline. In accordance with the Housing Supply Act mandate, CBRE has reviewed the forecasts associated with the OCP and the Planned Action Summary within the District's Year 1 Housing Targets Report.

2.10.1 Current Housing Forecasts

The District's long-term housing projections are primarily anchored in the 2025 OCP, which forecasts growth over a 20-year horizon. However, a review of these projections suggests that certain aspects of the underlying technical detail warrant further consideration:

- **Limited Land Capacity Analysis:** Rather than a detailed land capacity analysis completed by a third-party consultant, a standard component of most OCP updates that accounts for vacant sites, building age, lot assembly potential, and redevelopment likelihood, the District appears to have applied broader density assumptions across residential zones. This approach may not fully account for the economic or physical feasibility of individual sites to accommodate development.
- **OCP and Housing Needs Assessment Alignment:** The OCP projections (2,694 new units over 20 years) are broadly consistent with the Housing Needs Report figures (2,493 new units over 20 years), which is appropriate given that meeting projected housing needs is the legislative requirement. The primary consideration is whether the underlying assumptions supporting these projections are sufficiently grounded in site-level feasibility to ensure the targets are achievable in practice.
- **Short Term Targets:** The Year 1 Planned Action Summary from the Year 1 Housing Target Progress Report indicates a target of 40 new units by July 2026, followed by a significant increase to 208 units by July 2027.

2.10.2 Feasibility Analysis | Status Quo Scenario

Based on CBRE's review as outlined throughout this report, along with an assessment of the District's active building permits and recent completion data, the short-term targets may be challenging to achieve under current development policies and procedures:

- **Active Building Permits:** As of February 2026, active building permits are predominantly comprised of single-family dwellings and secondary suites. At current volumes, this composition may make it challenging to achieve the 208-unit increase projected for 2027.
- **Multifamily Development Gap:** Without a meaningful shift in the approvals process, there is limited evidence to suggest that the required volume of ground-oriented or multi-unit housing will be delivered in time to meet the July 2027 milestone. This reflects the challenges associated with achieving financially

feasible development under both the existing 2025 OCP framework and the emerging policy environment of the updated Zoning Bylaw anticipated in 2026/2027.

- **Subdivision Interest:** There appears to be meaningful latent interest from residents, particularly in the Southeast Quadrant, for modest subdivisions. However, as illustrated by cases such as 8511 Bexley Terrace, some applications have encountered procedural and policy challenges that have limited their progress. Increased confidence in the approvals process could encourage broader participation, and the District may have an opportunity to better facilitate this segment of housing supply.

2.10.3 Feasibility Analysis | Development Supportive Scenario

If the District moves toward a more consistent and predictable approvals environment, the targets may become more achievable, as market demand appears to be sufficient. This would likely benefit from the advancement of projects currently in the pipeline:

- **Pipeline Potential:** As identified in Section 2.6.2, there are hundreds of units in the pre-application phase, along with a notable 92-unit multifamily project (10612 McDonald Park Road) that is well advanced in the development application process. If significant projects such as these, or the proposed 30-unit townhome development at 9299 Canora Road, were to receive timely approvals, the District would be well-positioned to meet or exceed its Year 3 and Year 4 targets.
- **Standardized Approach:** Advancing projects from the Status Quo to the Development Supportive Scenario would represent an important step toward achieving the 208-unit projection for 2027 and making meaningful progress toward the 20-year demand outlined in the Housing Needs Report. This would be supported by a move toward a more consistent and structured planning process, which could provide greater certainty for applicants and improve processing efficiency across the department.

3 | Recommendations

This section outlines key recommendations for consideration by the Minister of Housing and Municipal Affairs. These are intended to address regulatory and procedural barriers, modernize land use policy, and support the delivery of housing necessary to meet the District's statutory obligations.

The recommendations outlined in this section are informed by the analysis, technical data review, and interview findings detailed throughout this report. Drawing on input from municipal staff and elected official interviews, developer meetings, intergovernmental correspondence, District files, and District proceedings, CBRE has developed an understanding of the structural, procedural, and financial considerations impacting housing delivery. The following consolidated recommendations are presented as a unified strategic plan. These actions are intended to address regulatory and procedural barriers, modernize land use policy, and provide the administrative framework necessary for the District to meet its statutory housing obligations.

3.1 Strategic Land Use and Regulatory Modernization

3.1.1 Delegation of Minor Development Variance Permits

The approvals process has at times been affected by the routing of minor technical adjustments through multiple layers of political oversight. Under the current Council Procedure Bylaw (Section 42), all development variance permits are routed through the Committee of the Whole for preliminary consideration before reaching Council for final issuance, creating a multi-stage review process for routine technical matters. This recommendation seeks to streamline this process by delegating minor development variance permits to staff, providing greater certainty and consistency in approvals. It is acknowledged that this recommendation would place additional responsibilities on planning staff; however, it is anticipated that a more structured and empowered approvals environment may also support staff retention.

- **Description:** The District should amend its Development Application Procedures Bylaw to delegate minor development variance permits to municipal staff, in accordance with Section 498.1 of the Local Government Act, by December 31, 2026. Minor development variance permits are restricted to variations in parking and loading requirements, and the size and dimensions of buildings, and cannot alter permitted land use or density. The District shall determine the specific thresholds defining what constitutes a "minor" variance. Section 2.9.6 in this report outlines reasonable ranges informed by comparable municipalities.

Table 16 | Proposed Minor Variance Thresholds for Residential Development

Type of Variance	Maximum degree of variance to be considered a minor variance
Yard Setback	50% reduction
Minimum Lot Size	20% reduction
Lot Coverage	15% increase
Lot Frontage	25% decrease
Building Height	1 metre
Minimum Number of Parking Spaces	20% reduction
Other Off-Street Parking Provisions	Any variance
Off-Street Loading	Any variance

- **Challenge and Public Interest:** This would establish a clear administrative track for routine adjustments, bypassing the Committee of the Whole and Council for matters that do not involve changes to land use or density. This reduces approval timelines for policy-aligned projects, lowers carrying costs, and optimizes Council's capacity to focus on complex, high-impact strategic matters.

3.1.2 Updated Parking Requirements

As detailed in Section 2.3.2, the District currently mandates a blanket parking ratio of 2.0 stalls per unit for all multi-family developments. This requirement exceeds those of adjacent and comparable municipalities across the region. Current parking requirements may pose challenges for housing development, as they can increase construction costs and affect project viability, or result in the creation of substantial parking areas with impacts on the natural environment. This recommendation seeks to align municipal parking standards with market demand to support more feasible and affordable construction. The proposed parking ratios outlined below are informed by a comparative review of similarly sized municipalities that have reduced parking requirements, detailed in Section 2.9.3.

- **Description:** The District must amend its off-street parking requirements to align with demonstrated market demand. The directive could establish a reduction to 1.2 stalls per unit, or a sliding scale of 1.0 stall for one-bedroom units, 1.2 stalls for two-bedroom units and 1.5 stalls for three-bedroom units. These figures are consistent with the standards adopted by comparable municipalities, including the Town of Sidney, the District of Central Saanich, and the City of Colwood. For Small-Scale Multi-Unit Housing (SSMUH), on-site parking could be capped at approximately 1.5 stalls per unit to support site viability. These figures are intended as a guide, with final requirements to be informed by the findings of the third-party parking demand 3.2.11.
- **Challenge and Public Interest:** Elevated parking ratios can require developers to construct surface or underground parkades, which significantly affect the financial viability of multifamily residential apartment projects. It is recognized that market developers have a commercial interest in providing sufficient parking to ensure project marketability and are unlikely to under-provide parking at the expense of project success.

Aligning parking requirements with demonstrated market demand would reduce hard construction costs and support the creation of missing-middle housing.

3.1.3 Exemption of Federal Airport Lands

As detailed in Section 2.4, the Victoria Airport Authority's Land Use Plan explicitly prohibits residential development across all land use designations within its jurisdiction, a position formally reinforced by Transport Canada through direct correspondence with the District. Despite this, the District's 2025 OCP designates a portion of Victoria Airport Authority lands for multi-family residential and commercial development, creating a conflict between municipal planning documents and federal land-use policy. While workforce housing in proximity to a major regional employment hub is an understandable planning objective, it cannot be achieved on federally governed aviation lands, and any housing capacity attributed to these parcels within the District's planning framework is not realistically achievable. This recommendation seeks to correct that misalignment and ensure that the District's housing obligations are met through lands that are within its jurisdictional authority.

- **Description:** The District of North Saanich is to amend its 2025 OCP by removing all references to residential use of lands under the jurisdiction of the Victoria Airport Authority and reallocate comparable residential capacity within the District to ensure that removal does not reduce the District's overall housing supply potential.
- **Challenge and Public Interest:** Federal land-use policy restricts residential development on aviation lands to protect ongoing aviation operations, manage noise and safety considerations, and preserve sufficient capacity for long-term regional and national economic growth. While workforce housing near major employment centres is a worthwhile goal, it must be pursued through municipally controlled lands that are appropriately designated and free of federal jurisdiction constraints. Clarifying the status of airport lands within the District's planning framework ensures that housing targets are grounded in realistic and achievable development capacity, and that obligations are not inadvertently deferred to lands that cannot legally accommodate residential uses. This recommendation supports a more transparent and accountable approach to housing planning in North Saanich.

3.1.4 Modernization of Subdivision and Lot Standards

As detailed in Sections 2.3.1 and 2.3.4 and in the appendix, current lot standards in North Saanich may be limiting opportunities for subdivision and gentle infill development in established neighbourhoods. The 2025 OCP applies a minimum lot size of 1,400m² across both General Residential and Neighbourhood Residential designations, which encompass the majority of currently zoned R1 and R2 lots. This threshold excludes a significant portion of the District's existing land base from subdivision potential and constrains the organic, incremental density that these neighbourhoods could reasonably support. This recommendation seeks to modernize these baseline standards to allow for gentle infill compatible with North Saanich's broader rural character of North Saanich.

- **Description:** The District of North Saanich must amend its Zoning and Subdivision bylaws to reduce minimum lot sizes and widths in residential zones, in accordance with the following specific standards, which are supported by the comparative municipal analysis provided in Section 2.9 and the infrastructure capacity findings outlined in Section 2.7:
 - For R1 zones, the minimum lot size shall be reduced from 1,400m² to 925m². It is noted that the 2025 OCP applies a uniform 1,400m² minimum across both General Residential and Neighbourhood Residential designations, and CBRE recommends that this 925m² threshold be applied consistently across all zones currently set at 1,400m², including any R2 zones that may carry forward that standard under the updated Zoning Bylaw.
 - Where R2 zones retain a distinct character warranting a different threshold, a minimum lot size of 1,300m² is recommended, reflecting the generally larger lot character of those areas. The District should confirm the appropriate threshold for each zone through the comparative analysis referenced in Section 2.9.4. Minimum lot widths of 20 meters are recommended for both R1 and R2 zones, consistent with standards observed in comparable municipalities.
 - To ensure compatibility with established neighbourhood character, new housing forms (duplexes and townhouses) shall continue to be governed by the existing density thresholds (FAR and lot coverage) of the underlying R1 and R2 zones. This approach ensures that multi-unit infill is delivered within a building footprint and massing consistent with existing single-family dwellings, focusing the increase on unit count rather than physical building size.
 - Additionally, the District must remove all panhandle lot restrictions and permit duplexes and townhouses as allowable uses in R1/R2 zones within the updated Zoning Bylaw. The District must permit these uses within the UCB to align with Provincial SSMUH objectives. These changes are consistent with the Southeast Quadrant infill strategy outlined in Section 3 and the SSMUH alignment objectives described in Section 2. While these uses are prioritized within the proposed UCB expansion areas, the District should also permit duplexes as an allowable use in R1 and R2 zones District-wide to facilitate organic, incremental density. In areas currently lacking municipal sewer service, this gradual density is expected to occur over time. On-site septic systems may be able to support this incremental growth until further infrastructure investment can be made in the future. In the interim, development density outside of serviced areas will be naturally governed by the technical capacity of individual on-site systems.
- **Challenge and Public Interest:** As illustrated by cases such as 8511 Bexley Terrace and 8650 Aldous Terrace, outlined in Section 2.6.2, current lot standards are limiting subdivision activity in areas where the existing land base and infrastructure could reasonably support modest infill. The proposed amendments are intended to align development standards with the physical reality of the District's land base and the incremental housing needs of existing and future residents. The subdivision of properties as landowners'

household requirements evolve can facilitate organic, neighbourhood-scale density without requiring large-scale land assembly or significant changes to community character.

3.1.5 Expansion of Accessory Development Potential

As detailed in Sections 2.3.1, 2.9.4 and in the appendix, current restrictions on secondary suites and accessory structures are among the most limiting in the region, with secondary suites capped between 60m² and 90m², guest cottages prohibited on lots under 0.99 acres, and a prohibition on combining a secondary suite and carriage home on the same property. These restrictions may be limiting a meaningful source of gentle density. This recommendation seeks to modernize the regulatory framework governing accessory dwelling units to maximize the utility of existing lots in serviced areas, consistent with the 2025 OCP objectives and provincial housing goals.

- **Description:** The District of North Saanich must amend its OCP and Zoning Bylaw to expand accessory development potential in accordance with the following specific standards, which are supported by the comparative municipal analysis provided in Section 2.9.4:
 - The maximum floor area for both Secondary Suites and Guest Cottages shall be increased to 110m². To ensure predictability and maximize the delivery of functional rental housing, the District should remove any secondary suite floor area limits based on a percentage of the principal dwelling's habitable area. The 110m² flat maximum shall serve as the primary size constraint, providing a clear and objective standard for homeowners and staff. This threshold is broadly informed by comparable municipal standards in the region, including the draft Zoning Bylaw update's own consideration of units up to 115m² as noted in Section 2.3.3. It is intended to provide functional living space while remaining compatible with neighbourhood character.
 - Guest Cottages shall be permitted on lots 0.5 acres or larger, representing a meaningful reduction from the current 0.99-acre threshold and reflecting the physical characteristics of a significant portion of the District's existing residential land base. Both a secondary suite and a carriage home or guest cottage shall be permitted concurrently on lots 1 acre or larger, removing the current prohibition on combining these two accessory dwelling unit types on a single property.
 - In areas currently lacking municipal sewer service, gentle infill density in the form of accessory dwelling units is expected to occur over time. On-site septic systems may be able to support this incremental growth until further infrastructure investment can be made. In the interim, development density outside of serviced areas will be naturally governed by the capacity of on-site systems.
- **Challenge and Public Interest:** The current regulatory framework effectively limits the utility of existing rural parcels by prohibiting the most productive combinations of accessory dwelling units and applying size restrictions that reduce the functional and financial viability of secondary suites and guest cottages. Expanding the potential for accessory development supports multi-generational housing and near-term

rental supply without requiring land assembly, infrastructure expansion, or significant changes to neighbourhood character. This will ensure that the regulatory framework is fully aligned with both provincial housing objectives and the practical needs of North Saanich residents.

3.1.6 Ministerial Approval of Priority Housing Applications

A small number of development applications in the District's active pipeline are well advanced, technically sound, and aligned with provincial housing objectives. Despite this alignment, these applications have encountered sustained procedural delays that have prevented them from advancing to approval. Under the Housing Supply Act, the Minister has the authority to direct a local government to approve specific development applications where delays are impeding the achievement of housing targets. This recommendation exercises that authority in respect of the priority application identified below.

- **Description:** The Minister shall direct the District to adopt the necessary OCP and Zoning Bylaw amendments required to enable the development at 10612/10622 McDonald Park Road. This application, for a six-storey, 92-unit multifamily residential building, represents the single most significant near-term housing supply opportunity in the District's active pipeline. The application is well advanced in the review process, with outstanding considerations relating to building height, parking ratios, and UCB alignment. Further, the Minister shall direct the District to provide a written status report within 60 days on all other active development applications identified in Section 2.6.2, confirming their current processing status and any outstanding requirements for approval.
- **Challenge and Public Interest:** The McDonald Park Road application alone represents 92 units of near-term multifamily housing supply, the delivery of which would make a material contribution toward the District's Year 2 and Year 3 housing targets at a time when the active development pipeline is thin. The application has been subject to a review period that exceeds standard processing timelines, and the outstanding considerations are either directly addressed by other recommendations in this report or resolvable through the policy and procedural changes recommended herein. Exercising Ministerial approval authority in respect of this file provides an important signal that technically sound, policy-aligned applications will be advanced, and that prolonged procedural delay is not a substitute for evidence-based decision-making.

3.1.7 Additional Strategic Planning and Policy Considerations

The following policy recommendations may be refined following the completion of the technical studies outlined over the following pages and are intended to create a regulatory framework that enables long-term housing supply across key growth nodes without significantly impacting the predominantly rural character of the community.

- **Multifamily Density and Height:** Subject to technical findings, multifamily land use designations should be revised to support apartment development up to six storeys with an FAR of between 2.5 and 3.0, consistent with the BC Building Code for wood-frame construction and financial viability thresholds.

- **Establish Southeast Quadrant Infill Area:** The Southeast Quadrant should be designated as an approved area for gentle infill ("Area 3"), with permitted uses expanded to include panhandle lots, duplexes, townhouses, and carriage homes, and minimum site size requirements reduced accordingly. This is consistent with the lot standard amendments recommended above.
- **Seniors Housing and Congregate Care:** Specific density bonuses and reduced parking minimums should be introduced for seniors' housing and assisted living facilities to encourage aging-in-place development, reflecting the demographic needs identified throughout the District.
- **Townhome Development:** Minimum lot sizes for townhome projects should be reduced, and maximum heights increased to three storeys at 1.2 FAR, ensuring sufficient space for under-unit parking and functional multi-bedroom layouts. Secondary suites within townhome units should be permitted to support affordability and rental supply.
- **Flexible Mixed-Use:** Commercial development at grade within apartment buildings should be supported but not mandated, allowing for market-driven flexibility and the organic emergence of local commercial amenities in key neighbourhood nodes.
- **Financial Incentives and Master Plans:** Revitalization Tax Exemptions should be implemented for purpose-built rental and seniors care developments in Areas 1, 2, and 3. Large-scale, master-planned communities delivering significant non-market and family housing in areas geographically separated from established low-density neighbourhoods should be prioritized for expedited processing.
- **Below-Market Rental and Seniors' Housing Covenants:** Developments receiving density bonuses for non-market or seniors' housing should be subject to a restrictive covenant and housing agreement on title, securing affordability and tenure for the economic life of the building.

3.2 Governance, Process Optimization, and Administration

The following recommendations address administrative and procedural factors contributing to delays in housing development in North Saanich and warrant additional consideration and implementation. These measures align with approaches used by comparable municipalities. They are intended to support the Planning Department, improve transparency to applicants and developers, and ensure technical considerations remain central to land-use decisions.

3.2.1 Urban Containment Boundary and Strategic Development Areas

It is recommended that the District prioritize efforts to extend the UCB to align with the CRD Regional Growth Strategy, with a particular focus on three key nodes: the McTavish Interchange ("Area 1"), Tsehum Harbour ("Area 2"), and the Southeast Quadrant, which includes the Allegro School Site ("Area 3"). It is further recommended that the District apply to the CRD for a minor amendment to the RGS to include Areas 1, 2, and 3 within the UCB, and that the OCP and Zoning Bylaw be amended to pre-zone these nodes to permit six-storey wood-frame residential development with an FAR of between 2.5 and 3.0.

3.2.2 Procedural Streamlining

The District should review the role of the Community Planning Advisory Committee (CPAC) in the context of multi-family and mixed-use development applications that are directly aligned with current policy. Consultations suggest that the CPAC process may at times introduce unnecessary uncertainty into the timelines for applications already vetted by staff. The District is encouraged to ensure that advisory review is focused on applications that add genuine technical and community value. The District is to provide an interim report on CPAC reviews of multi-family and mixed-use development applications, documenting any objections or proposed changes to technical aspects of applications that have been reviewed by municipal staff.

3.2.3 Development Finance Tools

The District should prioritize the adoption of a Development Cost Charge bylaw and an Amenity Cost Charge bylaw by the end of 2026. These tools would provide certainty to both the municipality and the development community and ensure that the costs of growth are equitably allocated.

3.2.4 Pre-Application Tracking

The District should implement a tracking system for all pre-application inquiries. Quarterly reports should be provided to the Province detailing the key particulars of each project under consideration, including address, unit count, unit mix, parking, policy alignment, target demographic, height, density, anticipated timeline, and technical rationale for progression or non-advancement.

3.2.5 Development Review Process

Council meetings and public hearings should be structured to ensure staff and applicant presentations are completed prior to public commentary, and applicants should be permitted to present on their own behalf at all public consultation and development application sessions.

3.2.6 Quarterly Staff Reports to Council

The District should reinstate quarterly reporting to Council on progress against long-range policy objectives, including housing targets and policy amendments. This standard administrative practice has been affected by recent departmental turnover, and its reinstatement would support greater transparency and accountability.

3.2.7 Firm Processing Timelines

The District should establish a formalized development review process with clear, publicized timelines for pre-applications, development applications, and policy-aligned approvals. As a benchmark, a target of four months from initial pre-application meeting to Council approval is recommended, assuming policy conformity and defensible technical rationale.

3.2.8 Departmental Resourcing and Stabilization

The District should institute formalized operating procedures and structured onboarding programs within the Planning Department, providing existing and incoming staff with consistent guidance and management support to address current capacity pressures.

3.2.9 Mandatory Council Training

The District should implement training for elected officials focused on land use economics, provincial housing legislation, the application of long-range planning policy, and basic development principles. The LGMA's community planning course for local government professionals is recommended as a starting point.

3.2.10 Third-Party Technical Support

The District should establish a framework where contested technical matters are referred to an independent peer reviewer for resolution, ensuring that certified professional reports on matters such as traffic, civil engineering, and environmental assessment are evaluated on their technical merits.

3.2.11 Technical, Financial, and Land Capacity Studies

The studies below warrant consideration and implementation. The identified studies are necessary to confirm whether the OCP and updated Zoning Bylaw create viable development scenarios and to ensure housing targets are actionable and realistic. The District could consider drawing from unused Growing Community Fund allocations to fund these engagements.

- **Third Party Financial Viability Testing:** Pro forma analyses should be completed to directly inform the Zoning Bylaw update and required OCP amendments, confirming that proposed land use designations, building heights, densities, and built-form requirements are economically viable. If this is not captured within the McElhanney scope, the District should expand that mandate or retain an additional real estate economics specialist. This work should also support the transition to a fixed-unit-price metric for Amenity Cost Charges.
- **Finalize Infrastructure Strategy:** The District should complete its infrastructure capacity assessment to confirm that the McTavish, Tsehum, and Southeast Quadrant - Allegro School Site growth nodes can support six-storey development, and that the Southeast Quadrant can accommodate the anticipated volume of infill subdivision inquiries.
- **Third Party Land Capacity Analysis:** A detailed land capacity study should be completed to confirm the actual development potential of properties designated for future development and identified growth nodes, ensuring that OCP housing projections are realistically achievable.
- **Third Party Parking Demand Analysis:** A District-wide parking demand study should be conducted to align parking ratios with unit sizes and realistic market demand. Preliminary targets, inclusive of guest parking, are recommended as 1.0 stalls for one-bedroom units, 1.2 stalls for two-bedroom units, and a maximum mandated requirement of 1.5 stalls for units with three or more bedrooms, including townhouses and multiplex projects. This approach ensures that parking requirements do not exceed a ceiling of 1.5 stalls per unit for any multi-unit housing form, regardless of project size or type. Unbundled parking should also be considered to separate housing costs from parking stalls and improve overall project affordability. This study is intended to inform and confirm the baseline standards established under Recommendation 2.
- **Third Party OCP and Zoning Review and Update:** Following completion of the above studies, a planning consultant should conduct a comprehensive review of land use designations and residential zoning bylaws to identify amendments required for alignment between the Zoning Bylaw, OCP, and CRD Regional Growth Strategy. These updates should be targeted for completion by December 31, 2026.

3.3 Intergovernmental Relations, Regional Alignment, and Public Communications

Achieving the District's housing targets will require constructive engagement with neighbouring governments, regional bodies, and the broader public. The following recommendations are intended to strengthen those relationships and support a more transparent and informed public conversation about housing in North Saanich.

3.3.1 Capital Regional District Collaboration

The District should proactively participate in regional planning forums to align its housing targets with regional infrastructure and transportation investments. It should treat the Urban Containment Boundary as a dynamic planning tool to be coordinated through the CRD rather than a static constraint, consistent with the UCB recommendation above. A formal review of the OCP should be initiated to confirm consistency with the CRD Regional Growth Strategy.

3.3.2 Victoria Airport Authority Collaboration

The District should formally recognize that Victoria Airport Authority lands are not available for residential development under federal land-use policy, consistent with Recommendation 3, and ensure that future planning documents reflect this position clearly to support a constructive and stable working relationship with the VAA.

3.3.3 First Nations Servicing Agreements

The District should actively collaborate with neighbouring First Nations to explore opportunities to formalize municipal servicing agreements for water and sewer infrastructure that could support development capacity on reserve lands. Master-planned housing projects proposed on these lands represent a mutually beneficial opportunity and would benefit from proactive municipal infrastructure engagement.

3.3.4 Data-Driven Public Education Campaign

The District should develop a formalized communications strategy to support informed public understanding of the long-range planning process and the implications of housing policy decisions. Publishing verified housing build-out projections and clear explanations of regulatory trade-offs could help ensure that community conversations about growth are grounded in accurate and accessible information.

3.3.5 Transparency in Financial Feasibility

The results of all third-party financial pro forma analyses associated with the Zoning Bylaw update and future OCP amendments should be publicly published. Demonstrating the relationship between built-form requirements, construction costs, and project viability can help build public understanding of why certain policy constraints, such as three-storey height limits and elevated parking requirements, present challenges for housing delivery.

3.3.6 Community Consultation Methodologies

The District should consider implementing statistically valid engagement processes for major planning initiatives to ensure that public input reflects a broad and representative range of community perspectives. This could help ensure that planning decisions are informed by the full spectrum of local views rather than a subset of particularly engaged voices.

3.4 Implementation and Monitoring

The following timelines categorize the key recommendations identified into phased milestones, reflecting the nature and complexity of each action required.

3.4.1 Priority Legislative and Regulatory Actions

The implementation of core land-use and regulatory changes is organized into two primary windows. Actions requiring bylaw amendments or administrative changes that do not depend on the completion of technical studies should be finalized by December 31, 2026. Actions contingent on third-party studies or more complex regulatory processes, such as OCP amendments or UCB applications, are targeted for completion by June 30, 2027, subject to confirmation by the Ministry.

3.4.2 Operational and Accountability Framework

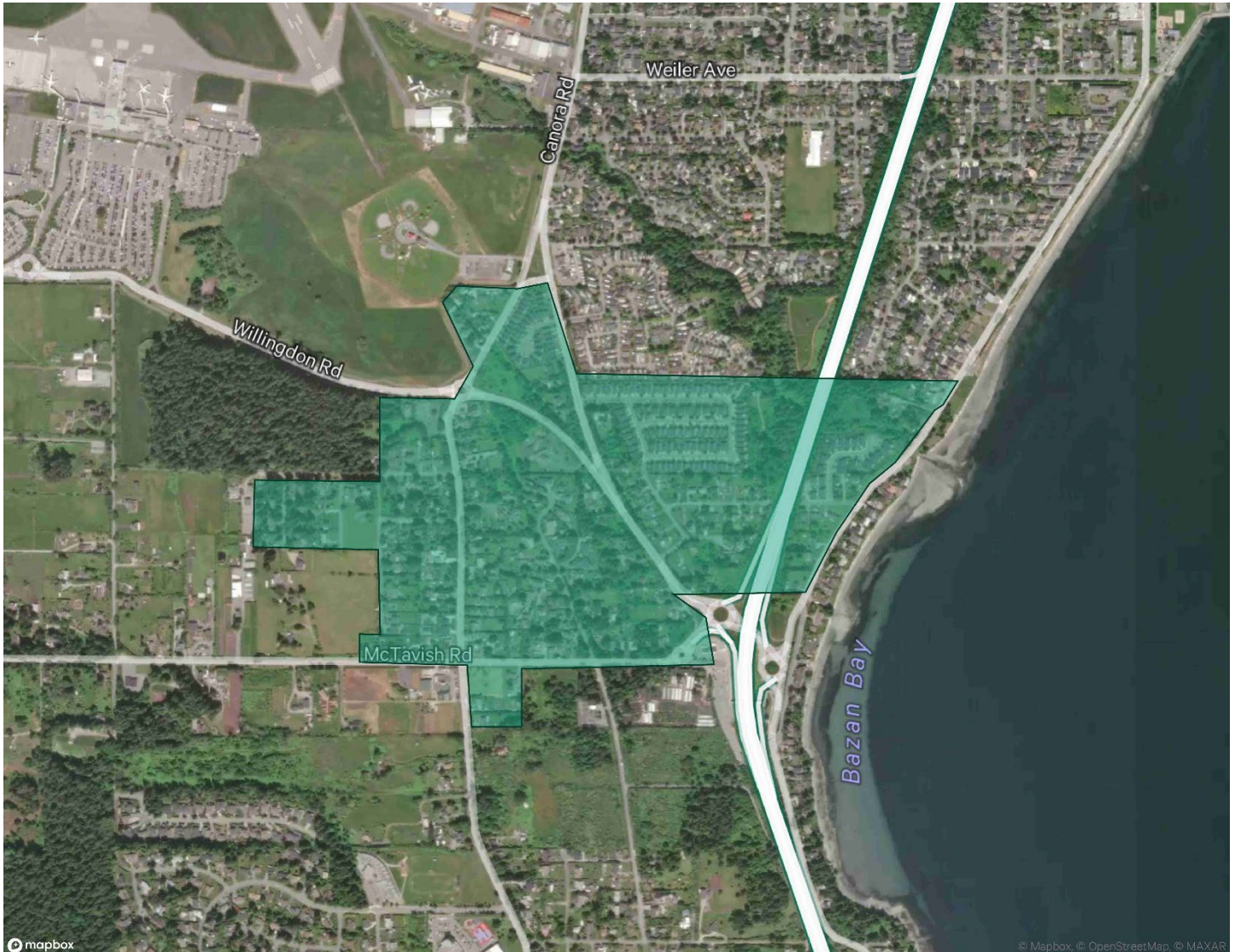
The progress-tracking initiatives outlined in Section 3.2 (Governance, Process Optimization, and Administration) should be implemented on an ongoing basis. The District's progress against these milestones should be reported to the Province on a quarterly basis through the Year 3 Progress Report. This frequency provides the Province with sufficient visibility into administrative and procedural progress without placing an undue burden on current departmental capacity.

3.4.3 Strategic Policy Advancement

The initiatives outlined in Section 3.3 (Intergovernmental Relations, Regional Alignment, and Public Communications) are intended to be advanced as they are informed by the completion of the technical studies detailed in Section 3.2.11. The District should provide comprehensive updates on the status of these policy advancements as part of its formal Year 2 and Year 3 Housing Target Progress Reports.

Appendix

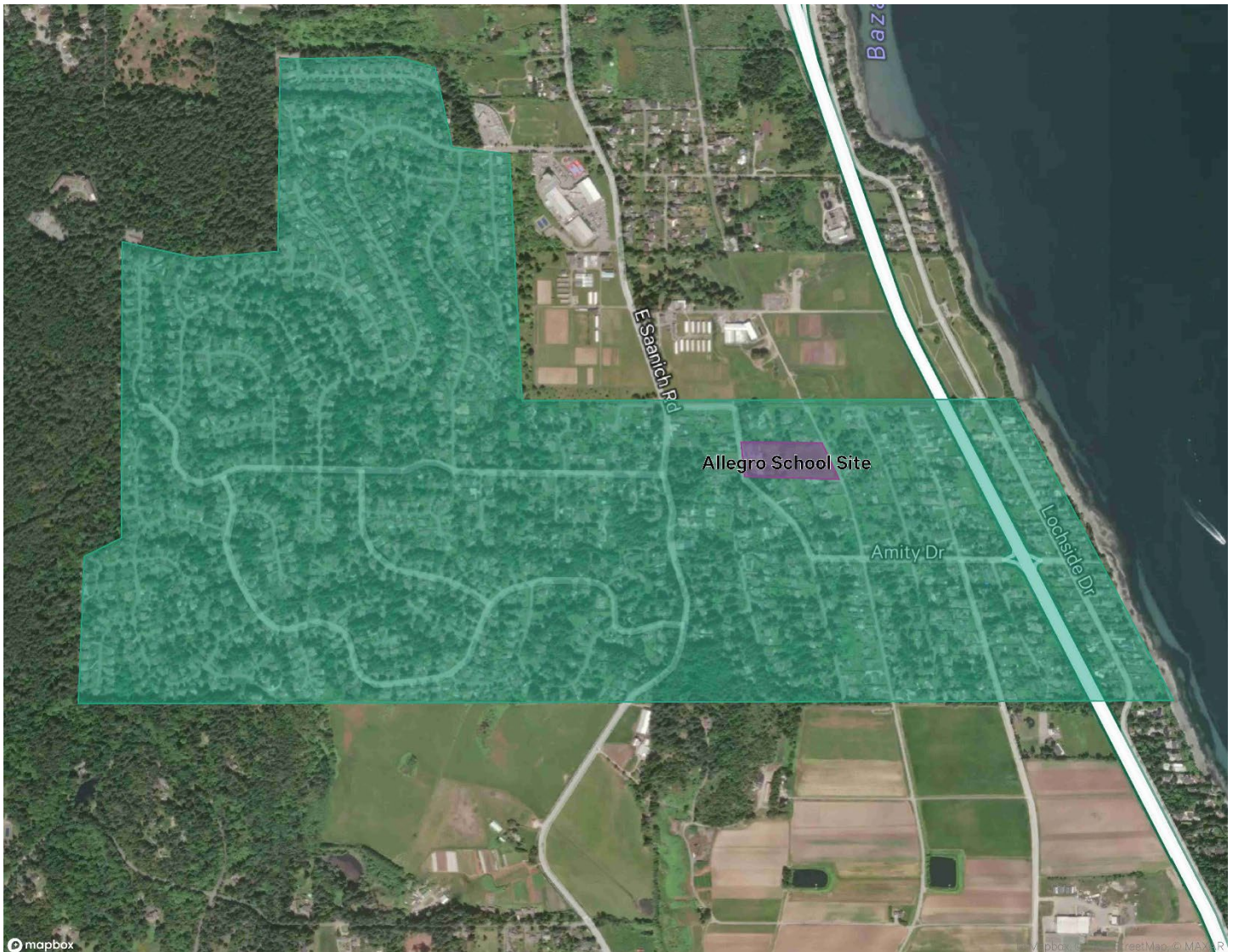
Development Focus Area 1: McTavish Interchange



Development Focus Area 2: Tsehum Harbour



Development Focus Area 3: Southeast Quadrant and Allegro School Site



Zoning Bylaw Definitions

The definitions within a zoning bylaw act as the primary filter for development, determining not only what is permitted but also the specific built form that development must take. By establishing rigid parameters for building types and occupancy, these definitions can unintentionally restrict the evolution and creation of housing to meet current needs and changing market conditions. The following zoning bylaw definitions have been highlighted due to their potential to reduce the viability of new housing development in the District of North Saanich.

- **Apartment:** The residential use of a building which contains three or more dwelling units, with each dwelling unit having its principal access from a lobby or hallway common to other dwelling units, and specifically excludes a motel or other temporary accommodation.
- **Carriage house:** A detached one-family dwelling accessory to a principal single-family residential dwelling constructed on the top floor of a garage of a site on which is situated a one-family dwelling.
 - **Note:** By requiring the unit to be over a garage, the bylaw effectively limits flexibility in creating ground-level garden suites and increases construction costs by requiring a structural garage as a prerequisite to the creation of a carriage house.
- **Dwelling Unit:** One self-contained unit with a separate entrance designed and used for year-round occupancy with complete living facilities for one or more persons.
- **Floor area, gross:** This is defined as the total floor area of all storeys of a building. Crucially, the calculation excludes the first 65m² (700 sf) of parking space in principal buildings, the first 185m² (2,000 sf) of any basement, and open areas like sun decks, exterior stairs, and uncovered swimming pools.
 - **Note:** Square footage flexibility for large basement areas can incentivize the construction of larger single-family homes with large basements rather than smaller, more attainable multi-unit buildings where the same floor area may be restricted.
- **Family:** Two or more persons related by blood, marriage, or adoption plus up to two unrelated persons, or up to four unrelated persons, living together communally as a single household and domestic unit
 - **Note:** This definition serves as a regulatory barrier to co-housing and communal living modes. By capping unrelated occupants at four, the bylaw restricts the ability for larger groups of peers to share housing costs in a single household.
- **Guest Cottage:** A self-contained dwelling unit accessory to a principal dwelling unit situated on the same lot, but not a temporary accommodation, and subject to the provisions of Section 204:
 - **Note:** Because guest cottages are prohibited from providing temporary accommodation (stays of less than 30 days), they cannot generate short-term rental revenue to offset high land and

construction costs. This limits the "end-user" strictly to long-term tenants or family members, potentially rendering the project financially unviable for homeowners who require supplemental income to justify the investment.

- **Note:** No guest cottage is permitted on a lot that has an area of less than 0.99 acres
- **Note:** Either the guest cottage or the single-family residential dwelling must be owner-occupied
- **Single Family Residential:** The residential use of one detached building per lot, consisting of one dwelling unit with one kitchen or food preparation area, which is occupied or intended to be occupied as a residence for one family, and includes:
 - **Note:** A secondary suite lawfully established in accordance with Section 206 (in which case a second clearly accessory dwelling unit is permitted); boarding and lodging for a maximum of two persons; a bed and breakfast home occupation
 - **Note:** Excludes temporary accommodation, which may limit the financial viability of a single-family home without supplementary income
 - **Note:** Can't have a secondary suite AND a carriage house,
 - **Note:** Secondary suite capped at the lesser of 90m² or 40% of habitable area
- **Townhouse Complex:** The residential use of building(s) which contain three or more dwelling units, with each dwelling unit having its principal access from a separate ground-level entrance, and excludes temporary accommodation
- **Temporary Accommodation:** The non-residential, commercial, or quasi-commercial use of sleeping accommodations for less than 30 consecutive days
- **Usable Open Space:** Means a compact, level, unobstructed area or areas available for use by all of a building's occupants, having no dimension less than 6.1 metres (20 ft.) and no slope greater than 10 percent, providing for greenery, open area recreation, and other leisure activities normally carried on outdoors, and excludes areas used for off-street parking, off-street loading, service driveways, required front yards, and roof areas.
 - **Note:** This definition mandates large, level, and unobstructed land parcels with a minimum dimension of at least 6.1 metres, which can be difficult to achieve on smaller lots once standard setbacks are applied. Consequently, this "land tax" per unit often forces a competition for ground-level space with mandated parking ratios, frequently making expensive underground parking the only mathematical way to satisfy both sets of requirements.

- **Section 206 – Secondary Suite:** Can not be in conjunction with another secondary suite, laneway house, carriage house, guest/caretaker cottage, or dwelling unit other than the principal dwelling unit of a single-family residential dwelling
 - **Note:** The gross floor area of a secondary suite must not exceed the lesser of 60m² in a CD-3 or CD-4 zone and 90m² in any other zone, *and* no more than 40% of the habitable area of the single-family residential dwelling
 - **Note:** The single-family residential dwelling in which the secondary suite is located must be connected to the District of North Saanich sanitary sewer system or be provided with an on-site sewage disposal system
 - **Note:** One additional off-street parking space for the exclusive use of occupants of a secondary suite must be provided
 - **Note:** A single-family residential dwelling that contains a secondary suite must not be subdivided under the Strata Property Act
 - **Note:** No secondary suites in a townhouse development or a townhouse complex, as this would create a “separate ground level entrance,” i.e., a second dwelling unit
 - **Note:** Many single-family residential zones do not allow or permit a secondary suite
- **Carriage House (conditions):** Lot must be at least 10m wide, not be used for more than one single-family residential dwelling unit in and one carriage house
 - **Note:** The GFA of a carriage house must not exceed the lesser of 649 square feet OR 18% of the lot area

Thank You

For more information

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