



Interior Health

May 6, 2022

Krista Gilbert, Planning Technician
Regional District of East Kootenay
19 24th Avenue South
Cranbrook, BC
V1C 3H8

Sent via email: kgilbert@rdek.bc.ca

Ms. Krista Gilbert:

Re: OCP and Zoning Amendment - Galloway Lands Proposal. File No - P 721 124

Thank you for this additional opportunity to provide feedback on the OCP and Zoning Bylaw amendments for the proposed Galloway Lands development, following the receipt of supplementary information from the applicant. We understand the applicant is seeking to amend the OCP designations and zoning in order to pursue a rural residential subdivision of 75 lots each approximately 1 hectare in size serviced by onsite drinking and wastewater systems, and restricting development to single-family dwellings.

We strongly recommend not approving the proposed OCP designation and zoning amendments because of a fundamental disconnect between the current and projected housing needs in the area, and the proposed development. As stated in our original letter pertaining to this referral, dated December 15, 2021, we support community development that aligns with [healthy built environment principles](#) – principles that have evidence-based links to positive population health outcomes and healthy communities.

Instead, we recommend developments that support the goals of the Elk Valley OCP (2014) including:

- 1. directing high density... development to municipalities and existing resort areas... supporting rural subdivision that does not interfere with the future development and expansion... rural sprawl will be reduced by directing growth to these development nodes;*
- 12. Greenhouse gas emissions created within the plan area will be reduced in order to mitigate climate change impacts.*

Healthy Housing

The Healthy Built Environment Linkages Toolkit is an evidence-based resource that links planning principle to health outcomes. Housing plays a significant role in influencing people's health – living in affordable, safe, and stable housing is associated with positive physical and mental health outcomes. Prioritizing a variety of

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.

diverse housing forms can help to meet the socioeconomic and demographic needs of all community members.

Compact, complete and connected neighbourhoods with more diverse housing options are principles for creating healthier, more equitable and more sustainable communities. When we reviewed this proposal last fall, we identified that it does not contribute well to either the Elk Valley or the greater Fernie area achieving Healthy Built Environment principles because it proposes a relatively high number of low-density, single-family homes in 'green-field' development away from daily amenities.

The biggest part of what makes housing 'healthy' is its cost relative to the income of the resident. When a dweller is required to pay more than 30% of their gross monthly income on housing, it is unaffordable because there is not enough money left over to pay for other determinants of health such as nutritious food, education, or health-related activities like dental care or physiotherapy. People who cannot afford suitable, stable housing have higher rates of chronic disease and hospitalization. Housing and health go hand-in-hand.

The [2021 RDEK Housing Needs Assessment](#) outlines key concerns related to housing in this area, including **the lack of affordability in both rental and ownership markets, as well as the lack of diversity in housing types available**. These issues are related, because often young adults, families, and lone parents have lower incomes and are searching for homes in townhouses, courtyard apartments, and other housing forms in the 'missing middle'. They also need housing close to daycares, schools, and jobs, and may not always have access to a vehicle. Many of these people are the folks working in local businesses and the tourism industry, and may not have the resources necessary to live in homes on large, green properties that are a drive away from everything else they need to live a healthy life.

The [2020 City of Fernie Housing Needs Report](#) states that, "**Housing affordability was the biggest concern for nearly all respondents.**" In February of this year, Statistics Canada released population data that demonstrated the City of Fernie grew by 924 residents in the last five years. This makes Fernie the fastest growing community in the Elk Valley and well above the BC and Canadian average. Yet we cannot simply build our way out of a housing crisis. The housing market does serve some segments of the population; however, the data in these reports proves how many are not able to access the market in any way.

The [Elk Valley Business Retention and Expansion Report](#) just released this spring reveals that housing is a major issue for businesses all over the Elk Valley. The report states that housing is a "major impediment to business expansion and retention in the Elk Valley, as well as future investment attraction and overall economic growth." Local restaurants and businesses in Fernie are already decreasing their hours and in

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.

some cases closing completely because they cannot find staff due to the shortage of affordable housing. A dampened economy indirectly affects all community members because there are fewer resources for achieving the things needed to live healthy lives.

The Elk Valley Business Retention and Expansion Report recommends that all local housing stakeholders come together for discussions aimed at increasing affordable housing for the Elk Valley workforce. The lack of low-cost housing is deemed, “a huge barrier to economic growth.”

Economic and Environmental Sustainability

Economies of scale is another very important economic consideration for local governments and communities to consider when making planning decisions that will have impacts into the distant future. When communities are more complete and compact the capital and maintenance costs of utilities (water, sewer, roads, etc.) and other amenities (parks, community centres, etc.) is less because distances are smaller (e.g. km's of asphalt or pipe) and more people are contributing to the overall costs. It also better stimulates local economic activity because businesses have the utilities and customers they need to be feasible. The Galloway Lands proposed development, with single-family, sprawling layout with onsite servicing situated between and in close proximity to the City of Fernie and Fernie Alpine Resort, will forever remove the opportunity for achieving economies of scale on this key land in the community.

A cornerstone of healthy built rural development is keeping drinking source water and wastewater (far) apart. This is part of a multiple barriers approach to safe drinking water. Drinking water is more reliably safe when there are more safeguards in place from source water to tap. Ensuring source water is free from contaminants is a very important safeguard. The information provided in the supplementary package regarding Individual On-site Lot/Home Wastewater Treatment is correct. At the time of subdivision, each proposed lot will be reviewed to ensure minimum standards can be met. In addition, at the time of house construction the sewerage system must comply with the Sewerage System Regulation. However, there are no requirements for private homeowners to install treatment or monitor their drinking water quality.

This OCP and Zoning amendment application is the only time that drinking water and wastewater can be considered at the neighbourhood level. Generally, when planning in rural settings it is best for relatively smaller parcels to be grouped together in settlement areas to achieve economies of scale for community systems, and for parcels outside of settlement areas to remain large in order to spread out wells and septic systems. One hectare is often used as a guide for *minimum* parcel size for lots serviced by onsite services. However, one-hectare lots interspersed with parcels of varying sizes is a different scenario than 75 one-hectare lots clustered together. As this is a brand new ‘green-field’ development it is important to consider the cumulative impact of an entire neighbourhood of septic systems, and whether meeting the minimum guideline for this many lots is sufficient. These long-term environmental health and sustainability

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.

considerations are beyond the *Sewerage System Regulation* requirements and the subdivision application process but are important for the RDEK to consider when making decisions on new developments.

In closing, having reviewed the supplemental information, we understand that the concerns raised in our December 15, 2021 letter have not been addressed, and the proposal is essentially unchanged. As such, we continue to **strongly recommend not approving these proposed OCP and zoning amendments**. Instead, we recommend supporting a development that will significantly contribute to achieving the identified needs of the broader community, in particular, housing needs.

We are committed to working collaboratively with the RDEK to support healthy, sustainable rural community development and land use planning and policy creation. In rural settings, we recommend clustering density toward settlement areas, and maintaining the integrity of large parcels of land.

Sincerely,



Kerri Wall, MA
Community Health Facilitator
Healthy Communities, Healthy Families



Anita Ely, BSc, BTech, CPHI(C)
Specialist Environmental Health Officer
Healthy Communities, Healthy Families

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.