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## MEMORANDUM

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**TO:** JOPSEPH FERNANDEZ, CAO  
**FROM:** JAMES VAN HEMERT, CONSULTING TOWN PLANNER  
**SUBJECT:** HOUSING NEEDS ASSESSMENT DATA REPORT FOR LAKE COWICHAN  
**DATE:** 4/22/2021

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I am providing the commission a commentary and amendment to the Housing Needs Assessment recently presented to Council by the CVRD and their consultants, Modus, and Rollo Associates.

I reviewed the January 2021 Draft Town of Lake Cowichan Housing Needs Assessment (HNA) Data Report and affiliated documents on January 12 and discovered significant errors and unsupportable conclusions. Notably, the consultants projected a population of **4,043 residents in 2025**. This would require population growth of 22% within 6 years, an annual growth rate of just under 4% per year. Such growth doesn't exist within the development approval 'pipeline'. Presumably this projection is sourced from the 'rennie intelligence' population projections of 3 years ago: at the time I voiced my concern and opposition to this unrealistic projection in all available public forums. Concurrently the Town was updating its OCP and the Advisory Planning Commission supported a much more modest, realistic and intelligent set of alternative projections.

The first draft of the HNA concluded that the housing need was **'93 single bedroom units.'**

In response to my comments a revised draft was completed, however, it repeated many of the same errors and unsupportable conclusions. Notably, it lowered the population projection to **3,527 in 2025** and identified a housing need of '- (negative) 22 single bedroom units, 16 2-bedroom units, and 99 3-bedroom units.'

Subsequently, I provided to CVRD and the consultants a recommended scenario based on our current BC assessment data for the number of households and our own projection for population based on local knowledge of development in the 'pipeline', available infrastructure,

and most recent growth rates. We anticipate a growth rate of 1.1 to 1.5% per year until 2025. Our data, analysis and conclusions were rejected because the consultants didn't want to 'introduce a new data source' and didn't want to 'edit all the sub-regional reports' which were already completed and distributed.

The following table illustrates the consultant's data and conclusions that are in the final draft of the HNA and the Town's data, projections and conclusions.

	<b>CVRD/MODUS/ Rollo 12/2020</b>	<b>Lake Cowichan Planning</b>
<b>Current population</b>	3394	3315
<b>Projected population in 5 years (2025)</b>	3527	3609
<b>% population change</b>	4%	8.9%
<b>Absolute population change</b>	133	294
<b>Number of households</b>	1500	1507
<b>Average household size</b>	2.26	2.2
<b>Projected ave. hshld. size in 5 years</b>	2.29	2.15
<b>Number of households in 5 years</b>	1542	1679
<b>Projected % change in no. of hshlds.</b>	3%	11%
<b>Increase in no. of households</b>	42	172

Note that the consultant's current population estimate is too high and doesn't square with BC assessment data. Also, the consultant's average household size is too high (2.26 increasing to 2.29) for both the current population and the projected population.

The consultant's conclusion for the number of bedrooms needed is therefore inappropriate given that the projections and conclusions are incorrect. They propose a need of 18 one-bedroom, 10 2-bedroom, and 15 3-bedroom units by 2025.

Using the Census Canada definition for bedrooms and household types and the consultant's percentage breakdown, the Town's planning consultant has prepared an alternative conclusion on the housing need by number of bedrooms as illustrated in the table on the next page.

**Table of Housing Need Comparing Housing Needs Assessment Conclusions with  
Town of Lake Cowichan Data, Analysis and Conclusions**

<b>Households 2016 (census) Need as defined by CMHC (1 bedroom per couple plus 1 per child)</b>				
	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom +</b>	<b>Total</b>
<b>count</b>	955	340	200	1495
<b>%</b>	64	23	13	

<b>Dwellings 2016 Actual Count (census)</b>				
	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom +</b>	<b>Total</b>
<b>count</b>	133	325	1018	1475
<b>%</b>	9	22	69	

<b>Need to 2025</b>		<b>HNA by CVRD/Modus/Rollo</b>		
	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom +</b>	<b>Total Additional Units</b>
<b>count</b>	18	10	15	43
<b>%</b>	42	23	35	--

<b>Need to 2025</b>		<b>Lake Cowichan Planning</b>		
	<b>1-bedroom</b>	<b>2-bedroom</b>	<b>3-bedroom +</b>	<b>Total Additional Units</b>
<b>% per census definition of need</b>	64	23	13	--
<b>count</b>	<b>110</b>	<b>40</b>	<b>22</b>	<b>172</b>
<b>% per CVRD HNA</b>	<b>42</b>	<b>13</b>	<b>35</b>	<b>--</b>
<b>count</b>	<b>72</b>	<b>40</b>	<b>60</b>	<b>172</b>

Note that we have increased the number of new houses needed from 43 to 172 and this number comprises 72 1-bedroom units, 40 2-bedroom units, and 60 3-bedroom units, based on the percentage allocation by the CVRD and their consultants. Note that if we apply the actual 2016 census distribution of household bedroom need (1 bedroom per couple, plus one per child), the need is 110 1-bedroom units, 40 2-bedroom units, and 22 3+ bedroom units.

Accepting the HNA data and conclusions places the Town at a disadvantage in seeking any affordable housing funds or projects, it provides incorrect information to developers seeking to provide affordable housing in accordance with Official Community Plan policy, and it simply lacks credibility. Finally, it is important to understand that the Local Government Act specifically requires that information from the Housing Needs Assessment be used when

creating and amending the Official Community Plan (Section 473 2.1). We should not be held to the incorrect and unsupportable conclusions of a report.

The Advisory Planning Commission reviewed this analysis on February 25<sup>th</sup> and agreed with the conclusions presented by the Town planning consultant.

**Recommendation:**

That Council adopts the following resolution:

that Council of the Town of Lake Cowichan receives the Housing Needs Assessment of January 2021 prepared by the Cowichan Valley Regional District as amended by a report prepared by the Town Planning Department in a memorandum dated March 16, 2021.