

## **Recreational Vehicles Report – Committee of the Whole – June 18, 2020**

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**File No. 6410-01**

### **Background**

During previous Board discussions, staff offered to provide information to the Board regarding the regulation of Recreation Vehicles (RVs) in the CRD.

### **Permitted Uses of RVs**

In the CRD, Recreation Vehicles are currently permitted in the following uses:

1. Use by the transient public in Tourist Commercial (C 2) zones. This allows for RVs to be used for camping and tourist accommodation on C 2 zoned properties throughout the region.
2. Guest accommodation, in a maximum of two RVs, on properties zoned RR 1, RR 2, RA 1, R/A, and BV-A (Beaver Valley Rural Agricultural Zone). The guest accommodation is restricted to a maximum of six months and must not be rented. This allows for owners of large properties to allow friends and family to visit and temporarily stay in an RV.
3. During construction of a permanent dwelling, property owners may reside temporarily in an RV or mobile home on-site. A Building Permit for the permanent dwelling must be issued, and the sewage disposal system for the RV or mobile home must comply with Health Regulations.
4. As of August 2015, criteria was adopted by the Board, allowing for the consideration of issuance of Temporary Use Permits for seasonal RV use and winter storage. The TUPs are considered by the Board on a case-by-case basis, however Temporary Use Permits can only be issued in specified areas of the CRD (discussed in the following section).

### **Temporary Use Permits for Non-Commercial RV Use**

At the August 21, 2015 meeting, the CRD Board approved Non-Commercial Recreational Use of an RV Policy PL6.3 (see attached policy and guide). The policy provides criteria for the Board to consider issuance of a Temporary Use Permit for up to two RVs to be used on a property for summer accommodation (non-commercial) and winter storage. Several conditions of approval are listed in this policy to help reduce negative impacts on surrounding properties, as well as to allow for a process of seeking public feedback from neighbouring properties. TUP applications are made and assessed on a case-by-case basis.

The Non-Commercial RV policy resulted from ongoing Board discussions regarding RV use between 2011 and 2015. The policy was developed in effort to strike a balance between the desire of owners of primarily undeveloped lots to use RVs in a responsible way, while minimizing long term detrimental impacts to neighbourhoods. It allows the Board some discretion to assess applications on a site-specific

and neighbourhood-specific basis, as depending on the level of development in different areas of the CRD, the desirability of RV use varies.

In order for a local government to issue Temporary Use Permits, a Temporary Use Permit area must be specified, most commonly in an Official Community Plan, but it can also be done through Rural Land Use Bylaws or Zoning Bylaws. Table 1 outlines the areas of the CRD which are identified as TUP areas. Some OCPs specify the entire area as a TUP area, while others identify specific land use designations only. The intent of limiting the area for TUPs was either due to the age of the OCPs (as TUPs could only be issued for Commercial or Industrial land uses prior to 2010), or in an effort to reduce impacts of unknown land uses being approved in some areas, particularly residential areas.

Interestingly, since adoption of the Non-Commercial RV Policy in August 2015, the CRD has not processed any TUPs for RV use. This could be due to the fact that the South Cariboo Area OCP and the Lac La Hache Area OCP are both relatively new, and the previous OCPs in these areas either did not allow for TUPs or only addressed Commercial/Industrial TUPs due to the age of the plans. Staff recommend harmonizing TUP areas and requirements across the Regional District.

A noted challenge with implementation of TUPs for RVs is within the Interlakes Area OCP, where TUPs are not permitted in areas designated Deka Lake Settlement Area, Lakefront Residential, and Rural Residential 3, among others. The Board should be cautious in broadly allowing TUPs within the plan area, without first giving consideration to the challenge of regulating Short Term Rental Accommodations (STR's aka AirBnB's, Vacation Rentals).

In many local governments, Short Term Rental accommodations are commonly regulated through Temporary Use Permit schemes. Due to public feedback during development of the current South Cariboo Area and Lac La Hache Area OCPs, Short Term Rentals were specifically excluded from consideration of TUPs in those areas. A similar OCP statement should be considered (and is recommended by staff) if the Board desires to harmonize the TUP areas across the region, including the Interlakes OCP area. Staff recommend the STR restriction to be considered an interim measure until such time that Short Term Rental accommodation regulations can be more fully addressed, including a public engagement process.

<b>Table 1 – Temporary Use Permit Areas within the Cariboo Regional District</b>		
<b>CRD Area</b>	<b>TUPs Permitted</b>	<b>TUPs Not Permitted</b>
150 Mile House Area OCP	All OCP Area	N/A
Green Lake Area OCP	OCP Designations: Resource, Agriculture, Rural Holding, Small Holding, Rural Residential, Highway Commercial, Tourism Commercial, Resort Commercial, Industrial	OCP Designations: Residential Cluster, Neighbourhood Commercial, Service Commercial, Institutional, Park
Interlakes Area OCP	OCP Designations: Rural Residential 1, Rural Residential 2, Commercial, Industrial, Agricultural, Resource Area	OCP Designations: Deka Lake Settlement Area, Gravel Reserve, Interlake Corners Development, Lakefront Residential,

		Public Recreation Reserve, Rural Residential 3
Lac La Hache Area OCP	All OCP Area	N/A
Quesnel Fringe Area OCP	All OCP Area	N/A
South Cariboo Area OCP	All OCP Area	N/A
Williams Lake Fringe Area OCP	OCP Designations: Agriculture, Resource Area, Rural Residential 1, Rural Residential 2, Commercial, Industrial	Community Residential, Gravel Reserve, Institutional, Lakeshore Residential, Manufactured Home Park, Parks Recreation and Open Space, Residential, Rural Residential 3, Utility, Provincial Gravel Reserve
North Cariboo Area Rural Land Use Bylaw	All Areas, except Barkerville Townsite, Satellite, and Protected Areas	Barkerville Townsite, Satellite, and Protected Areas
Central Cariboo Area Rural Land Use Bylaw	All Areas	N/A
Chilcotin Area Rural Land Use Bylaw	All Areas	N/A
South Cariboo Area Zoning Bylaw (areas not within an OCP)	TUPs must be issued by bylaw only.	N/A

### **RVs as Affordable Housing and Long-Term Residence**

Recreation Vehicles are not considered dwellings by, and do not conform to, the BC Building Code. They are not designed for long term use, especially in northern climates where there is a significant heating season. There are substantial risks to utilizing RVs for full time occupancy as a residence. Common issues include:

1. Unsightly additions and coverings/tarps to protect from the weather;
2. Fire and suffocation risks due to propane heating during the winter;
3. Moisture build up and ventilation issues (especially in colder months) resulting in mould and related health concerns;
4. Environmental contamination risks. Some people are known to drain grey water and/or black water to ground or pits. Once the RV is permanently affixed or boarded in and insulated, there is nowhere to remove or drain full holding tanks for grey or black water. This directs residents to the increased usage and density of outhouses, which have their own health risks and environmental impacts.
5. Taxation concerns, as RVs are not assessed as structures by the BC Assessment Authority. If RV residents are permanently living on properties, they can be expected to utilize services of the CRD, yet equitable levels of property taxation cannot be established.

Compounding the above concerns, is the collective challenge of increasing costs and decreasing availability of housing throughout BC (and to a greater extent, North America). Nonetheless, the need for affordable housing must be balanced with the need for housing to be safe for residents and not

negatively impact surrounding neighbourhoods nor the environment. It must be noted that allowing sub-standard or risky housing in response to a housing crisis is not necessarily a prudent solution. The availability of affordable housing is a greater issue, primarily of Provincial jurisdiction. The appropriate response to the housing affordability challenge is to continue with housing needs assessments and seek ongoing Provincial action in providing healthy, safe, and affordable long-term housing options in the Cariboo. The CRD is best positioned to support this effort through enabling the development of safe and affordable *permanent* housing solutions and not by allowing RVs for use as long-term housing.

Currently, within the CRD there are many forms of affordable housing allowed, such as mobile homes, manufactured homes, and small, traditional wood-framed construction, permitted on all rural and residential zoned properties. Secondary suites, duplexes, carriage houses and second dwellings are also permitted in many of these zones. Of further note, is the opportunity for property owners to reside temporarily in an RV or mobile home on-site while constructing a permanent home. Comparatively (and historically), many local governments prohibit many of these dwelling types and uses throughout all or some of their jurisdiction. Staff assert that the existing regulations in the CRD provide a reasonable opportunity for residents to develop safe, affordable housing while ensuring public safety and the development of healthy neighbourhoods.

## **Recommendations**

Staff recommend maintaining the current regulations for Recreation Vehicle (RV) use, striking a balance between encouraging permanent investment, ensuring public safety, maintaining environmental health, and allowing for a diversity of affordable housing options within the CRD. Staff further recommend that they be directed to harmonize Temporary Use Permit areas and conditions across the Regional District. This would include prohibiting Short Term Rental accommodation through Temporary Use Permits on an interim basis, until a greater assessment can be considered by the Board.

Planning staff intend to bring a more detailed report considering Short Term Rental Accommodations to a future Board Meeting.