



June 2024

Small-Scale Multi-Family Housing Provincial Policy Manual & Site Standards – CRD Review Summary

Please note only sections with relevance to the Cariboo Regional District’s geographical, procedural, legislative, and development context are presented in this document.

SSMUH Policy Manual Section	Summary/Excerpt	CRD Consideration
<p>Intro, Sec. 2.2 (p. 2)</p>	<p>Local governments should also consider applying this manual, and updated zoning bylaw requirements to existing low-density, multi-family residential zones to improve consistency and the ease with which SSMUH can be developed.</p> <p>Local governments should also consider applying this manual, and updated zoning bylaw requirements to existing low-density, multi-family residential zones to improve consistency and the ease with which SSMUH can be developed.</p>	<p>CRD will consider updates during implementation of the zoning and rural land use bylaw consolidation project. Work is also underway in developing proposed ADU regulation amendments that will move towards greater alignment with provincially recommended standards and alignment with CRD member municipalities.</p>
<p>Pt. 1, Sec. 2, Table 1 (p. 7)</p>	<p>Overview of SSMUH requirements for single family and duplex zones.</p> <p>A minimum of 1 secondary suite and/or 1 detached accessory dwelling unit (ADU) must be permitted in <i>Restricted Zones</i> in all municipalities and regional district electoral areas. Local governments may choose to do any of the following for single-family residential</p>	<p>All R 1, R 2, R 3, RL, RL 2, RR 3, and RR 2 zones permit either a secondary suite or carriage house, subject to provisions outlined in zoning or rural land use bylaw.</p> <p>All RR 1, RA 1, R/A, RA 2 zones permit either a secondary suite, carriage house, or detached secondary dwelling, subject to provisions outlined in zoning or rural land use bylaw.</p>

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	<p>lots to which the higher density requirements for a minimum of 3-6 units do not apply:</p> <ul style="list-style-type: none"> • permit only one secondary suite, • permit only one ADU, • allow landowners to choose either a secondary suite or an ADU, or • permit the construction of both a secondary suite and an ADU. <p>In setting their requirements, local governments should ensure the requirements of other provincial legislation and regulations are met (e.g., the <i>Drinking Water Protection Act</i> and the <i>Sewerage System Regulation</i>). In addition, only secondary suites (not ADUs) should be permitted on properties less than one hectare in size that are not serviced by sewer systems operated by a local government.</p>	<p>Zoning and Rural Land Use Bylaws specify compliance with sewerage system regulations. They do not reference drinking water protection act. CRD as a matter of practice does not enforce other provincial regulation and legislation.</p> <p>CRD does not restrict carriage house development on properties less than one hectare in size. CRD relies on landowner's responsibility to comply with provincial water and sewer requirements.</p>
<p>Pt. 1, Sec. 2.1 (p. 10)</p>	<p>Local governments must not use certain authorities in such a way that unreasonably prohibits or restricts the use or density of use required to be permitted under SSMUH. This includes the following powers identified in the LGA:</p> <ol style="list-style-type: none"> a) a power under s.488 [<i>designation of development permit areas</i>], b) a power in relation to a land use regulation bylaw or land use permit, c) a power under s.614 [<i>designation of heritage conservation areas</i>], or d) a power in relation to a heritage alteration permit, as defined in s. 586. <p>The SSMUH legislation also prohibits local governments from doing the following:</p> <p>...</p>	<p>Current CRD practices are not unreasonably restricting use or densities required under SSMUH legislation.</p> <p>CRD adopted Development Procedures, Guidelines and Fees Bylaw No. 5458, 2024 on Jan. 12, 2024 which specifies rezoning application procedures when public hearings are prohibited.</p>

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	<ul style="list-style-type: none"> holding a public hearing on a zoning bylaw or amendments to zoning bylaw proposed for the sole purpose of complying with the SSMUH legislation. 	
Pt. 1, Sec. 3 (p. 11)	<p>There are two circumstances under which local governments are exempted from all SSMUH requirements, including those for secondary suites and ADUs. Those are in relation to exercising enumerated land use and planning authorities in respect of:</p> <p>...</p> <ul style="list-style-type: none"> a rural land use bylaw under section 457 of the LGA. 	<p>Proposed amendment bylaws do not apply to Rural Land Use Bylaws (RLUBs), however, it is important to note that pre-existing regulations permit ADU's in most Rural and Residential zones throughout the CRD's RLUBs.</p> <p>CRD staff do not recommend pursuing any further exemptions that may be available under the SSMUH legislation.</p>
Pt. 1, Sec. 3.1 (p. 13)	<p>3.1 Considerations for hazardous conditions and protection of the natural environment</p> <p>Local governments should continue to use their authorities under LGA, s. 491(2) to identify hazard areas where considerations related to health, safety, or protection of property from damage warrant land use regulations. These authorities will continue to apply for lots and areas impacted by SSMUH zoning. See Part 3, Section 1.4 for more information about development permit areas for hazard areas.</p> <p>Local governments can also continue to use their authorities under LGA, s. 491(1) to specify areas of land that warrant special measures for the protection of the natural environment on lots to which SSMUH requirements apply, provided this authority does not unreasonably obstruct the intent of the SSMUH legislation. See Part 3, Section 1.3 for more information about development permit areas for environmental protection.</p>	<p>CRD will continue reviewing potential landslide and flood hazard areas as described in the annual business plan.</p>
Pt. 1, Sec. 5 (p. 15)	<p>Implementing SSMUH requirements</p>	<p>CRD staff intend to implement SSMUH requirements in accordance with provincial legislation and policy manual guidance. Should the Board adopt Zoning Amendment Bylaw Nos. 5480, 5481, and 5482 prior</p>

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		to June 30, 2024, staff are confident that the CRD will be compliant with the applicable legislative requirements.
Pt. 1, Sec. 6 (p. 19)	Development application processes and in-stream development applications	<p>Development Procedures, Guidelines and Fees Bylaw No. 5458, 2024 was adopted on Jan 12, 2024.</p> <p>No changes are anticipated to development application processes. Current processes largely align with policy guidance.</p> <p>Policy guidance recommends removing landowner residency requirements on properties with rented ADU's. Staff will consider bringing such an amendment to the Board for future discussion.</p> <p>No in-stream applications have been identified that may be affected by the proposed zoning bylaw amendments.</p>
Pt. 1, Sec. 7 (p. 20)	Relationship with other provincial legislation	Staff do not anticipate any conflict or concerns with other development-related provincial legislation discussed in the policy manual.
Pt. 1, Sec. 8 (p. 26)	Overview of other related Provincial initiatives	No areas of concern identified.
Pt. 2, Table 2 (p. 32)	Common zoning bylaw requirements that will deter SSMUH development	See specific comments in table below.
Pt. 2, Sec. 1 (p. 34)	<p>Building Type</p> <p>Local governments implementing SSMUH zoning bylaw updates should be flexible in terms of permitting the full range of combinations and configurations for SSMUH buildings, up to at least the specified density or unit limit on a given lot.</p> <p>When updating zoning bylaws to allow a wider range of housing forms, local governments should consider the implications for existing uses like single-family homes. If single-family homes are no longer allowed in a zone, it could cause all the existing single-family homes to become legal non-conforming.</p>	CRD regulations generally align with applicable recommendation regarding zoning for building types.

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Pt. 2, Sec. 2 (p. 35)	Density/Intensity	CRD OCP's, Zoning Bylaws, and Rural Land Use Bylaws generally regulate density by lot size, rather than specified density calculations. Accordingly, these recommendations do not apply.
Pt. 2, Sec. 3 (p. 36)	Lot line setbacks	CRD generally specifies lot line setbacks higher than provincial recommendations. Staff do not anticipate current regulations to unduly restrict ADU development, given large lot sizes in the region. Areas that are most likely impacted will be small-lot lakefront development, where consideration of site-specific development proposals via a development variance permit application will be prudent.
Pt. 2, Sec. 4 (p. 38)	Building Height/Storeys	CRD regulations vary in the definition of building height. This may restrict some roof types on three storey buildings. This building typology is rare in the region, and not anticipated to hinder ADU development. Staff are actively working on preparing amendments which would increase maximum carriage house height from one to two storeys, bringing alignment with provincial recommendations as well as CRD member municipalities.
Pt. 2, Sec. 5 (p. 39)	Lot Coverage	Maximum lot coverage on CRD's larger lot zones (i.e. RR 1, RA 1, R/A) is below the provincial standard, however, these are for very large lots, generally over 9.88 acres in size. To-date, staff have not encountered situations where lot coverage would impede maximum density build-out of a permitted additional ADU on a rural property.
Pt. 2, Sec. 6 (p. 40)	Parking requirements	Provides consideration for requiring on-site parking spaces on rural properties, particularly where on-street parking is not available.
Pt. 3 (p.46 – 64)	Other considerations for implementing SSMUH requirements	No major divergence from provincial guidelines or discussion identified.
Pt. 4 (p. 65 – 68)	Site Standards Recommended site standards packages are developed to guide zoning bylaw amendments to implement SSMUH development.	Site Standards Package A is applicable to the CRD and addressed in the table below.

SSMUH Policy Manual, Part 4 – Table 5 – Site Standards Package A (with CRD comparison added)

Zoning Bylaw Parameter	Provincial Recommended Benchmark Regulation	Provincial Considerations	CRD Regulation	CRD Considerations
Front Lot Line Setback	Minimum of 5 –6 metres	This front lot line setback maintains some consistency with conditions in most rural and semi-rural areas.	Minimum 7.6 m	Given the dominance of large, rural lot sizes, the present setback is not anticipated to impact development potential, other than on some lots which already have site constraints (usually small lakefront lots), where variances are considered on a case-by-case basis, and additional density should be reviewed carefully given potential impact on water quality.
Rear Lot Line Setback	Minimum of 6 metres for principal buildings Minimum of 1.5 metres for ADUs		Varies generally from 3.0 m to 7.6 m for all structures	Not anticipated to impact development potential given large rural lot sizes within the CRD.
Side Lot Line Setbacks	Minimum of 1.2 metres	This minimum requirement will enable flexibility for a large range of lot sizes, configurations, and building types. Larger distances from property lines are likely to be used by builders or developers to meet BC Building Code requirements for combustible buildings, and to accommodate drive aisles to back of the property (if used).	Varies generally from 1.5 m – 7.6 m	On smaller properties, 1.5 m ensures rural character and maintains BC Building Code separation requirements. On larger properties, the larger setbacks are not anticipated to impact development potential.
Maximum Height	Maximum building height of 11 metres to the mid-point of a pitched roof or highest point of a flat roof on principal buildings At least 8 metres for accessory dwelling units	A universal height limit that permits three stories regardless of the method of measurement, site gradient, or roof style is recommended to help improve the viability and diversity of SSMUH housing forms.	Maximum 10.67 m total height from average finished grade to highest point of roof on principal buildings. Maximum 7.62 m height for Carriage House. Secondary dwelling maximum 10.67 m.	Current height regulations meet the context of rural character expected in the CRD. Staff will monitor whether future amendments are recommended based on development proposals and variance requests.

Maximum Number of Storeys	3 storeys for principal dwellings 2 storeys for accessory dwelling units	In smaller lot settings, permitting 3 stories may reduce the loss of trees, green space, or farmland. In larger lot settings, large distances between adjacent dwellings mitigate relative height and privacy concerns.	Principal dwellings indirectly restricted to 3 storeys via maximum height limit of 10.67 m. Carriage House limited to 1 storey (although this single storey can be located on the second floor). Secondary Dwellings limited to 2 storeys.	Staff are presently working on ADU regulatory amendments that will recommend removal of the single storey limit for Carriage Houses.
Maximum Lot Coverage	25-40%	Relatively low lot coverages will help limit the size and cost of new units on large lots. 25% may be appropriate for large lots and up to 40% for smaller lots.	10% - 40%	Given large lot sizes, staff have not encountered situations with lower than recommended coverage maximums that hinder development.
Off-Street Parking Requirements	One space per dwelling unit		2 spaces for principal dwelling; 1 space per ADU	Two spaces for principal dwelling unit is recommended due to minimal public transit and vehicle ownership.

SSMUH Policy Manual, Part 2, Table 2 – Common zoning bylaw requirements that will deter SSMUH housing forms (with CRD considerations added)

Bylaw requirement	Potential negative impacts on SSMUH outcomes	Possible solutions(s) or mitigations	CRD Considerations
On-site parking requirements that are too high	Likely to reduce the viability of projects due to space limitations on traditional single-family and duplex lots, and also to reduce site permeability and livability.	Eliminate on-site parking requirements or adopt a modest maximum requirement (e.g., 0.5 spaces/unit) where residents have access to sustainable forms of transportation like public transportation or active transportation, and where on-street parking is available. More on-site parking may be considered (e.g., 1 space/unit) where public transportation or on-street parking is not available.	CRD requires two spaces for principal dwelling unit and one space for each ADU. Two spaces for principal dwelling unit is recommended due to minimal public transit and vehicle ownership patterns in the region. On-street parking is not feasible in the CRD due to the rural design standard of streets and snow clearing requirements.
Insufficient height allowances	Limits of 1, 2 or 2.5 storeys will affect project viability or increase lot coverage to the point of reducing site permeability and livability. If height maximums are too low, it can also create challenges for evolving building technologies designed to improve sound and fire separation.	A universal maximum height limit that permits at least three stories regardless of the method of measurement, site gradient, or roof style improve the viability and diversity of SSMUH housing forms. This will also enable configurations and designs to be flexible so they can accommodate competing objectives (e.g., permeable surfaces, tree retention, open space for residents, parking spaces). 11 metres is often considered an appropriate building height limit to facilitate three storeys, based on a common approach of measuring building height from grade, which is to the midpoint of a pitched roof or the highest point of a flat roof from the average elevation of all corners of the building.	Current height regulations meet the context of rural character expected in the CRD. Staff will monitor whether future amendments are recommended based on development proposals and variance requests.
Servicing requirements triggered by additional units	Beyond the need to tie new units into existing water, sewer, and stormwater services, requiring upgrades to the distribution and collection system owned by the local government can add hundreds of thousands of dollars and render projects not financially viable.	Consider whether existing housing occupancy and consumption rates (in the case of water and sewer) align with assumptions underlying up-to-date infrastructure servicing models. Generally, occupancy and demand levels today are much lower than in past decades, meaning additional modest density in new units can be added with negligible impacts	Servicing upgrades are not required by CRD at building permit stage.

Bylaw requirement	Potential negative impacts on SSMUH outcomes	Possible solutions(s) or mitigations	CRD Considerations
		and without necessitating the need for system upgrades. Demand management measures, such as watering restrictions and on-site stormwater management features (e.g., rain gardens), can help mitigate servicing impacts.	
Limitations on the visibility or positioning of entrances for non-principal dwellings	Regulating the positioning of doorways can significantly limit the viability of different SSMUH building forms, which are already constrained by lot size and configuration, setbacks, and geotechnical considerations.	Remove regulations related to the positioning of entrances on non-principal dwellings. Recognize the potential for internal facing entrances to improve the livability of new units (e.g., through a courtyard arrangement or shared green space) and encourage them through design. This approach should take into account any requirements for unit addresses to be visible for emergency response, and servicing considerations if units front onto laneways.	CRD does not regulate doorway positioning or other visibility issues.
Owner-occupation requirements for secondary suites	This condition on the establishment and use of secondary suites unnecessarily limits the availability of rental units, is contrary to the intent of zoning bylaws to regulate use (not users) and is regarded as questionable legally ¹⁰ .	Remove owner-occupation requirements for secondary suites. Where they exist, address concerns about property maintenance, noise, or other nuisance directly through appropriate local government bylaws.	CRD regulations currently require owner to reside on any property with an ADU. Staff will bring this issue back to the Board for further consideration at a future meeting.