



**URBAN DEVELOPMENT INSTITUTE- OKANAGAN CHAPTER**

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September 1, 2017

The Corporation of the District of Peachland  
5806 Beach Avenue  
Peachland, BC, V0H 1X7

Attention: Cory Gain, Director of Planning and Development Services

Dear Cory:

**Re: UDI Feedback on Manufactured Home Parks Bylaw & Zone and Development Permit Area Guidelines**

The Urban Development Institute (UDI) is a national association (with international affiliations) of the development industry and its related professions. The corporate members of the UDI - Okanagan Chapter represent hundreds of individuals involved in all facets of land development and planning, including: developers, property managers, financial lenders, lawyers, engineers, planners, architects, appraisers, real estate professionals, local governments and government agencies.

As a Partner in Community Building, the UDI Okanagan is committed to working with communities and governments to create and achieve the vision of balanced, well-planned, sustainable and affordable communities.

Thank you for soliciting our feedback on the District of Peachland's proposed new Manufactured Home Park bylaw and amendments to the RM-1 Manufactured Home Park zone, as well as the proposed new Development Permit Area Guideline.

Please find our comments below:

**RM-1 Zone & Bylaw Comments**

- Principal Uses
  - There is some dialogue within the Manufactured Home Park bylaw that refers to 'Accessory Structures', yet it is not explicitly stated that 'Accessory Structures' are part of the permitted use in the zone.
    - UDI Recommendation: Add 'Accessory Structures' under 'Uses Permitted'.

- Technical Prescriptions
  - UDI Recommendation: Change the minimum Lot Width from 13m to 12.3m.
  - The current limitation to a single storey height is a significant issue from a modular housing point of view, especially within hillside sites. It is important to recognize that modular units can be stacked on top of each other, whereas mobile homes are not able to be stacked due to the structural constraints of that building form, and must remain single storey. Other municipalities, such as the City of Kelowna, currently allow up to three storeys for modular homes. Having the ability to stack modular homes is helpful in increasing the production of attainable housing products.
    - UDI Recommendation: Create a clear distinction between mobile homes and modular homes. Keep the current maximum height limit in place for mobile homes, but increase it for modular homes to 3 storeys / 9.5m.
  - The District currently does not allow development on lands with a slope of greater than 30%. While this is commonly stated by other municipalities as well, sometimes even with a 30% slope a lot may have an adequate home site or be shown to be suitable by a Geotechnical Engineer. This will become much more critical as time goes on and as development moves more towards the hillsides. Sometimes this can be the difference between a project moving forward or not.
    - UDI Recommendation: Allow some flexibility within the bylaw to allow for suitable sites to be developed even with a slope of greater than 30% if an adequate home site exists or if it is deemed suitable by a Geotechnical Engineer.
  - The zone currently limits decks, carports and accessory buildings to a relatively small proportion. This is too restrictive as the market may need more than the prescriptive maximums. This is also unnecessary since there is already a space coverage maximum of 50% contained within the bylaw. This space coverage maximum limit is adequate to manage the size of the carport, deck space or the size of any addition.
    - UDI Recommendation: Remove the entire section titled 'Additions, Decks and Carports' from the bylaw.
- Limitation Distance for Mobile Homes
  - UDI Recommendation: Add a clause, similar to that of the City of Kelowna, that states that 'the limiting distance between mobile homes should be 5.5m unless permitted by fire protection regulations but in no case closer than 1.5m to another mobile home'.
- Buffer Prescriptions are Undesirable
  - Historically, there has been a public perception that conventional communities need to be protected visually and socially from trailer and manufactured home communities. This often leads to buffer prescriptions around these types of developments. Unfortunately, these buffers drive up the cost of housing, can encourage symbolic social discrimination, and are not in alignment with 'Safety Through Urban Design' best practices. These days, there are more and more examples of manufactured home parks that are unscreened and integrate well with the surrounding community.

- UDI Recommendation: Remove the buffer prescriptions for manufactured home parks.
- Recreation Facilities
  - There is currently an obligation within the zone for 5% of the area of a Manufactured Home Park to be provided and maintained as an amenity area. This is in excess of the 5% park space that the developer is also obligated to provide as part of the development obligation under the Local Government Act. This appears to be excessive and in some cases may not always be warranted, especially in smaller developments.
    - UDI Recommendation: Remove the minimum 5% amenity dedication requirement for all Manufactured Home Parks.
- Interior Roads
  - Currently, the District is requiring all onsite roads and services to comply with the existing Servicing Subdivision Bylaw. However, under the Local Government Act, it states that 'A local government must not impose a requirement under subsection (1) (b) or (c) in respect of a subdivision under the Strata Property Act'.
    - UDI Recommendation: Amend the 'Interior Roads' section of the bylaw to reflect that the development Servicing Bylaw Standards should not apply to strata or non-subdivided development sites. Rather the Building Code adequately applies to strata developments.

#### **Development Permit Area Guideline Comments**

- While it is acceptable for a municipality to request Form & Character Development Permits (DPs) for single detached homes, this practice is very uncommon in the Okanagan. Since none of the other surrounding municipalities require this, it becomes an excessive regulatory obligation for developers trying to develop in Peachland.
- Manufactured Housing (Mobile & Modular) are off the shelf factory products, which are not easily reconfigured. This limits the effectiveness of conventional form and character management using the DP process.
- In addition, Intensive Residential DPs will add process and cost to an affordable housing product thereby inflating cost.
  - UDI Recommendation: Consider removing the requirement for Form & Character DPs and focus instead on addressing neighbourhood interface issues in other ways, such as through subdivision evaluation.

Thank you in advance for considering our feedback.

Kind Regards,

**URBAN DEVELOPMENT INSTITUTE**

Per:

Kevin Edgecombe  
UDI Okanagan Chapter President