

# ADMINISTRATIVE REPORT



**TO:** Planning & Development Committee  
**FROM:** B. Newell, Chief Administrative Officer  
**DATE:** October 19, 2023  
**RE:** Subdivision Servicing Bylaw Review – Manufactured Home Park Regulation Bylaw

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## Administrative Recommendation:

**THAT Bylaw No. 2597, 2012, the Regional District of Okanagan-Similkameen Manufactured Home Park Regulations, be repealed in conjunction with the introduction of a new Subdivision Servicing Bylaw; and**

**THAT the land use bylaws be amended to require:**

- .1 a manufactured home park development be connected to a community water system and community sewer system;**
  - .2 a second access from a public highway, separated by at least 60.0 metres from the first access be provided to each manufactured home park use containing greater than fifty (50) homes;**
  - .3 internal access “roadway” requirements, such as minimum widths (including paved width), cul-de-sac turning radius, grade and length.**
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## Purpose:

To provide the Board with options regarding the Manufactured Home Park Regulations Bylaw No. 2597, 2012, in relation to the on-going review of the Subdivision Servicing Bylaw.

## Background:

Under Section 298 (Building regulation bylaws) of the *Local Government Act (the “Act”)*, the Regional District may, amongst other things, “regulate the construction and layout of ... manufactured home parks” and require that these provide “facilities” specified by bylaw.

At its meeting of July 19, 1982, the Regional District adopted a Campsite and Mobile Home Park Bylaw No. 713, 1982, and it is understood that this Bylaw was based upon a provincial template provided to local governments in the late 1970s

In 2012, the Regional District initiated a review of the Manufactured Home Park Bylaw as part of a broader review of the manufactured home park (RSM) zones.

This resulted in the adoption of the current Manufactured Home Park Regulations Bylaw No. 2597, 2012, in which “facilities”, as authorized by Section 298 of the Act, included the following:

- Access (Vehicles)
  - Buffer Strips (Screening)
  - Drainage (Storm)
  - Fire Hydrants
  - Garbage Disposal
  - Recreation Areas
  - Roadways (Driveways)
  - Sewage Treatment & Disposal
  - Skirtings
  - Street Lighting
  - Walkways
  - Water Supply
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In order to confirm compliance with the “facilities” standards established by the bylaw, the Regional District is able to require a Manufactured Home Park (MHP) Permit be obtained prior to commencing such a use.

Existing Manufactured Home Parks:

There are currently twelve (12) parcels which are zoned for Manufactured Home Park (e.g. RSM1), and these are located within Electoral Areas “C”, “D”, “H” and “I”; of which, one is wholly unoccupied, one is largely undeveloped, and three (23%) of which are within the ALR.

With respect to water and sewer servicing, four (31%) are either wholly or partially within community sewer service areas and five (38%) are within community water service areas.

The eleven (11) developed parcels are largely considered to be non-conforming, with most manufactured homes having been placed prior to the establishment of zoning and/or the Mobile Home Park Bylaw in 1982.

Subdivision Servicing Bylaw Review:

Subdivision Servicing Bylaw No. 2000, 2002 is currently under review and the regulations that apply to water and sewer design standards will be updated. The Regional District may, by bylaw, require the provision of works and services for either subdivision or as part of the issuance of a building permit.

**Analysis:**

The review of the Subdivision Servicing Bylaw is an opportune time to revisit the implementation of a dedicated bylaw requiring “facilities” for manufactured home parks. The Manufactured Home Park Regulations Bylaw imposes an overly prescriptive burden in relation to one specific type of use that the Regional District does not apply to other residential developments.

**Option No. 1 - Repeal MHP Regulations Bylaw**

In favour of repealing the bylaw is a recognition that, in addition to applying a higher standard of development to one form of low density residential development, many of the regulations contained in the bylaw are vague and provide insufficient direction.

For instance, the water, sewer and storm water regulations *generally* reference the need to comply with various provincial legislation and do not convey any specific Regional District design standards. If the intent is to require that a campground be properly serviced by a water and sewer system, this can be addressed through either the zoning or subdivision servicing bylaw(s).

Similarly, the bylaw specifies that an operator of a manufactured home park shall install street lighting to “adequately illuminate” access roads while pedestrian walkways “shall be appropriate for safety, convenience, and appearance ...”

Juxtaposed to this are *highly* prescriptive requirements for, amongst other things, the design of private access roads within a park (e.g. maximum lengths, paved widths, turning radius, grades and speeds).

Other regulations related to MHP design standards, including layout (i.e., manufactured home space requirements, density), manufactured home standards, recreation areas buffers and walkways, would be repealed in addition to the existing regulations pertaining to water and sewage disposal servicing.

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### Option No. 2 – Amend the MHP Regulations Bylaw

Another option would be to undertake a review of the Manufactured Home Park Regulations Bylaw with the intent of only retaining those regulations seen to warrant additional review through the issuance of a MHP Permit. This option would require additional discussion to determine which design standards are worthy of retention (see Attachments Nos. 1 to 14 for an overview of the existing standards).

### Option No. 3 - Status Quo

Under this option, no further action would be taken and a MHP Permit will remain a requirement prior to the development of a new manufactured home park or the alteration of an existing manufactured home park.

### Summary:

There is merit in streamlining the number of bylaws regulating the development of campgrounds within the Regional District and removing a permit process that is not applied to other tourist commercial operations.

The Manufactured Home Park Regulations Bylaw should be repealed as part of the introduction of a new Subdivision and Development Servicing (SDS) Bylaw and the following requirements should be incorporated into other land use bylaws:

- a manufactured home park be connected to community water and sewer systems, which would further support growth management objectives in the RGS and electoral area OCP bylaws;
- a second highway access be required for developments that exceed 50 units, as this is seen to be a safety issue (secondary emergency access/egress); and
- internal access “roadway” requirements, such as minimum widths (including paved width), cul-de-sac turning radius (15m), grade and length.

### Public Engagement:

Any amendments will be incorporated as part of the engagement process for the review of the Draft SDS Bylaw.

### **Alternatives:**

- .1 THAT the Regional District of Okanagan-Similkameen Manufactured Home Park Regulations Bylaw No. 2597, 2012, be amended as follows:
  - a) *TBD*.
- .2 Status quo.

### **Respectfully submitted:**

  
C. Garrish, Senior Manager of Planning

  
S. Duong, Planner II

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- Attachments: No. 1 – Overview of Section 4.1 (Manufactured Home Space)  
No. 2 – Overview of Section 4.2 (Manufactured Home)  
No. 3 – Overview of Section 4.3 (Skirtings)  
No. 4 – Overview of Section 4.4 (Recreation Areas)  
No. 5 – Overview of Section 4.5 (Buffer Strip)  
No. 6 – Overview of Section 4.6 (Access)  
No. 7 – Overview of Section 4.7 (Roadways)  
No. 8 – Overview of Section 4.7 (Walkways)  
No. 9 – Overview of Section 4.8 (Drainage)  
No. 10 – Overview of Section 4.9 (Water Supply)  
No. 11 – Overview of Section 4.10 (Sewage Treatment and Disposal Systems)  
No. 12 – Overview of Section 4.11 (Garbage Disposal)  
No. 13 – Overview of Section 4.12 (Fire Hydrants)  
No. 14 – Overview of Section 4.13 (Street Lighting)

Attachment No. 1 – Overview of Section 4.1 (Manufactured Home Space)

Bylaw Section Number	Comments
<p>4.1.1 Each manufactured home space shall be clearly marked off by permanent, flush stakes, markers or other suitable means.</p>	<p>Difficult to confirm compliance at permit assessment/issuance stage and it is more useful having a survey plan prepared to assist with issuance of building permits for individual manufactured homes and determination of compliance with zoning regulations.</p> <p>Layout of a manufactured home park does not have to be completed by a British Columbia Land Surveyor (BCLS), making accuracy of markers questionable.</p> <p>Modification of an MHP space is seen to be an internal issue between a resident of a park and the owner/operator (unless it is contrary to zoning).</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.1.2 All manufactured home spaces shall:</p> <ul style="list-style-type: none"> <li>a) be drained to a storm sewer or other system constructed in accordance with accepted engineering practice and meet any applicable building code requirements;</li> <li>b) be clearly numbered;</li> <li>c) have a clearly discernible manufactured home pad constructed in accordance with the BC Building Code.</li> </ul>	<p>This regulation:</p> <ul style="list-style-type: none"> <li>• does not provide sufficient guidance (i.e. it is unclear what “accepted engineering practice” or a “clearly discernable” pad may be);</li> <li>• refers to other statutory/regulatory standards (i.e. BC Building Code); and</li> <li>• addresses an issue where the Regional District’s interests are unclear (i.e. visibility of pad numbers).</li> </ul> <p><u>Recommendation</u>: regulation be deleted.</p>

Attachment No. 2 – Overview of Section 4.2 (Manufactured Home)

Bylaw Section Number	Comments
<p>.1 All manufactured homes shall meet or exceed the Canadian Standards Association Standard Z240, Z241 or A277, as the case may be.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. Canadian Standards Association) and the requirement that a manufactured home being placed in a MHP comply with the applicable CSA standard is otherwise covered by the zoning and building bylaws. <u>Recommendation</u>: regulation be deleted.</p>
<p>.2 All connections to services shall be in accordance with the BC Building Code and the BC Plumbing Code.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. BC Building Code and BC Plumbing Code). <u>Recommendation</u>: regulation be deleted.</p>
<p>.3 In manufactured homes located in a manufactured home park:  a) the installation and maintenance of all oil burners and oil-burning equipment and appliances using inflammable liquids as fuel;  b) the storage and disposal of inflammable liquids and oils; and  c) the installation, maintenance, carriage, and use of compressed gas systems;  shall be in accordance with the regulations of the <i>Fire Services Act</i> or the <i>Gas Act</i>, as the case may be.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. <i>Fire Services Act</i> and <i>Gas Act</i>) and does not need to be repeated. <u>Recommendation</u>: regulation be deleted.</p>
<p>.4 No manufactured home shall be located elsewhere in a manufactured home park than in a manufactured home area on a manufactured home space that has been approved by the Building Inspector.</p>	<p>A Building Inspector is not assessing suitability of a MHP space and the Zoning Bylaw otherwise establishes permitted density for a MHP and requires a home be placed within a MHP space. <u>Recommendation</u>: regulation be deleted.</p>
<p>.5 Notwithstanding subsection 4, no more than one unoccupied manufactured home for every 10 manufactured home spaces in a park may be located in a designated storage area.</p>	<p>It is not clear what the Regional District’s interest is in limiting the number of manufactured homes that can be stored on a site if a storage area exists. <u>Recommendation</u>: regulation be deleted.</p>

Attachment No. 3 – Overview of Section 4.3 (Skirtings)

Bylaw Section Number	Comments
<p>4.3.1 Skirtings shall be installed within 60 days of installation of a manufactured home on a manufactured home space, and shall have two easily removable access panels of a minimum width of 1.2 metres. One panel shall provide direct access to the area enclosed by the skirting for inspection or servicing the service connections to the manufactured home, and the other providing access to the area enclosed by the skirting for storage.</p>	<p>Difficult to confirm compliance at permit assessment/issuance stage.            This is seen to be an issue between a resident of a Park and the owner/operator. Regional District water and sewer servicing would only be extended to the property line of a Park with connection of individual units within the Park the responsibility of the owner/operator.            It is not clear what the Regional District interest is in this requirement.  <u>Recommendation</u>: regulation be deleted.</p>
<p>4.3.2 Spaces shall be ventilated, as required pursuant to the BC Building Code.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. BC Building Code) and does not need to be repeated in an RDOS bylaw.  <u>Recommendation</u>: regulation be deleted.</p>

Attachment No. 4 – Overview of Section 4.4 (Recreation Areas)

Bylaw Section Number	Comments
<p>4.4.1 Not less than 5% of the gross site area of the manufactured home park shall be devoted to tenants’ recreational uses, and shall be provided in a convenient and accessible location. For the purpose of calculating recreational space requirements, any indoor recreational space provided shall be counted as double its actual area.</p>	<p>It is understood that this provision is related to the 5% parkland dedication requirement that exists under the <i>Local Government Act</i> for certain subdivisions. As an MHP remains private land and is not subdivided, this section of the Act is not triggered. Moreover, such a “recreation area” would only be accessible only to residents of the park and not the general public.</p> <p>A better course of action might be for the Regional District to pursue a park land dedication DCC for manufactured home parks so they contribute to public park land.</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.4.2 The recreation areas shall not include yard areas, parking areas, ancillary buildings, mobile home spaces, driveways and storage areas.</p>	<p>This can be better addressed by introducing a definition for “recreation area” (if it is determined to retain the requirement for recreation areas in a MHP).</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.4.3 In manufactured home parks where more than 1,000 metres<sup>2</sup> of recreation space is required, two or more recreational areas may be provided.</p>	<p>It is also not clear what the Regional District’s interest is in regulating the design of a recreation area to this degree of detail.</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.4.4 Recreation areas in the manufactured home park, except indoor recreation facilities, shall be of a grass, concrete or asphaltic surface and shall be properly landscaped.</p>	<p>It is also not clear what the Regional District’s interest is in regulating the design of a recreation area to this degree of detail.</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.4.5 Swimming pools, if provided, shall be in accordance with the <i>BC Building Code</i> and “Pool Regulation” under the <i>Public Health Act</i> and shall be separated from the remainder of the manufactured home park by a fence not less than 1.5 metres in height and shall comply with all zone setbacks.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. BC Building Code and <i>Public Health Act</i>) and does not need to be repeated in an RDOS bylaw. The Regional District’s Building Bylaw already regulates the placement of fencing around a pool, while the zoning bylaw establishes certain setbacks for pools.</p> <p><u>Recommendation</u>: regulation be deleted.</p>



Attachment No. 5 – Overview of Section 4.5 (Buffer Strip)

Bylaw Section Number	Comments
<p>4.5.1 Every manufactured home park shall have immediately within all its boundaries, a buffer of a minimum of 4.5 metres in width within which the following are not permitted:</p> <ul style="list-style-type: none"> <li>a) required recreation or amenity areas;</li> <li>b) buildings or structures, except permitted signs and fences;</li> <li>c) garbage disposal areas;</li> <li>d) private sewage disposal system, other than the underground part of the system;</li> <li>e) vehicle parking area(s).</li> </ul>	<p>It is understood that this regulation is intended to ensure that a MHP is screened from adjacent land uses, including residential, for aesthetic/streetscape reasons. Such buffer strips may no longer be required given advances in manufactured home design.</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.5.2 Except where a hazard has been identified by a suitably qualified individual (e.g. arborist), no plant material may be removed nor may any substance of which land is composed be deposited or removed from a buffer area except as part of an approved landscaping plan.</p>	<p>The bylaw does not require an approved landscape plan, making assessing compliance difficult. It is also not clear what the Regional District’s interest is in regulating landscaping to this degree of detail.</p> <p><u>Recommendation</u>: regulation be deleted.</p>
<p>4.5.3 The only roads permitted in a buffer area are those which cross it as close to right angles as practical and connect directly with the road system contained within the remainder of the manufactured home park. No road shall traverse a buffer area and give direct access from a public highway to a manufactured home park.</p>	<p>It is understood that this regulation is intended to limit the number of access points to a MHP for aesthetic/streetscape reasons (i.e. by requiring accessing to spaces be from the internal road network). It is not clear what the Regional District’s interest is in regulating MHP to this degree.</p> <p><u>Recommendation</u>: regulation be deleted.</p>

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Attachment No. 6 – Overview of Section 4.6 (Access)

Bylaw Section Number	Comments
4.6.1 A second access from a public highway separated by at least 60.0 metres from the first access, shall be provided to each manufactured home park containing 50 or more manufactured home spaces, up to a maximum of 3 accesses.	The provision of a second highway access for a MHP use comprising more than 50 spaces is seen to be related to internal vehicle movements and health and safety considerations (i.e. secondary access/egress point in the event of an emergency). <u>Recommendation:</u> provision be incorporated as a “General Regulation” in the zoning bylaws.

Attachment No. 7 – Overview of Section 4.7 (Roadways)

Bylaw Section Number	Comments
<p>4.7.1 All manufactured home spaces, owner's residential plot, storage areas, and service buildings as well as other facilities where access is required shall have access by internal street systems.</p>	<p>Access to internal sites requiring access is assumed.  <u>Recommendation</u>: regulation be deleted.</p>
<p>4.7.2 Minimum roadway width requirements shall be as follows:            a) Roads shall have a minimum paved width of 7.0 metres and a right-of-way of 15.0 metres;            b) One-way roads shall not exceed 150.0 metres in length;            c) Dead-end cul-de-sacs shall not exceed 150.0 metres in length; and            d) Dead-end roads and cul-de-sacs shall have a turning circle right-of-way at the dead-end with a radius of at least 15.0 metres.</p>	<p>In light of the potential size and density of manufactured home parks, the specification of minimum “roadway” standards is seen to be important and worth retaining in a separate land use bylaw.  <u>Recommendation</u>: regulation be retained.</p>
<p>4.7.3 Roads shall be adapted to the topography, and shall have suitable gradient for safety of traffic that shall not exceed a grade of 12%.</p>	<p>In light of the potential size and density of manufactured home parks, the specification of minimum “roadway” standards is seen to be important and worth retaining in a separate land use bylaw.  <u>Recommendation</u>: regulation be retained.</p>
<p>4.7.4 Minimum speed for road design shall be 30 km/h.</p>	<p>The regulation does not provide sufficient guidance (i.e. it is unclear what the Regional District considers a road design to allow a minimum speed) and it is not clear what the Regional District’s interest is in regulating speeds within a manufactured home park.  <u>Recommendation</u>: regulation be deleted.</p>

Attachment No. 8 – Overview of Section 4.7 (Walkways)

Bylaw Section Number	Comments
4.7.5 Pedestrian walkways shall provide safe, convenient, all season pedestrian access. They shall be of adequate width for intended use and shall be durable and convenient to maintain.	The regulation does not provide sufficient guidance and is structured as a guideline making it difficult to assess compliance and/or enforce. <u>Recommendation</u> : regulation be deleted.
4.7.6 Pedestrian walkways shall be located in areas where pedestrian traffic is concentrated; e.g., the park entrance, park office, and other important facilities. Pedestrian walkways should preferably be through interior areas removed from the vicinity of streets.	The regulation does not provide sufficient guidance and is structured as a guideline making it difficult to assess compliance and/or enforce. <u>Recommendation</u> : regulation be deleted.
4.7.7 Alignment and gradient of walkways shall be appropriate for safety, convenience, and appearance, and shall be suitable for use both by pedestrians and for the circulation of small wheeled vehicles such as baby carriages, service carts and wheelchairs.	The regulation does not provide sufficient guidance and is structured as a guideline making it difficult to assess compliance and/or enforce. <u>Recommendation</u> : regulation be deleted.
4.7.8 Width of pedestrian walkways shall generally be at least 2.0 metres.	The regulation is only seen to be engaged if a pedestrian walkway is being constructed but, as the bylaw does not require pedestrian walkways to be constructed, its utility is uncertain. Further, the regulation is written as a guideline (e.g. “shall generally be”). <u>Recommendation</u> : regulation be deleted.
4.7.9 Individual walkways shall provide access to each manufactured home space from a street or parking space connected to the street.	It is not clear what the Regional District’s interest is in regulating a connection to a space from a vehicle parking space or internal road to a home. <u>Recommendation</u> : regulation be deleted.

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Attachment No. 9 – Overview of Section 4.8 (Drainage)

<b>Bylaw Section Number</b>	<b>Comments</b>
4.8.1 All manufactured home parks shall be provided with a storm water drainage system installed according to a design by an appropriately registered professional to contain runoff on site, or discharge it to a storm runoff system in accordance with relevant provincial guidelines.	The regulation refers to a separate statutory/regulatory standard (i.e. professional standards, provincial guidelines). This is seen to be a civil matter between adjacent property owners and potentially engages the interests of the Ministry of Transportation and Infrastructure (MoTI) is drainage is being directed into the public road reserve.  <u>Recommendation</u> : regulation be deleted.

Attachment No. 10 – Overview of Section 4.9 (Water Supply)

Bylaw Section Number	Comments
<p>4.9.1 The owner of the manufactured home park shall supply the Regional District with proof of adequate water quantity and quality, as specified by Regional District water standards and by the Ministry of Health requirements.</p>	<p>The provision of adequate water supply for a proposed development is a requirement of the Draft Subdivision and Development Servicing Bylaw.  <u>Recommendation:</u> regulation be incorporated within the new Subdivision and Development Servicing Bylaw.</p>
<p>4.9.2 The community water distribution system design must be prepared under the direction of a design professional who has the appropriate experience and is registered with the Association of Professional Engineers and Geoscientists of British Columbia.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. professional reliance). The Draft Subdivision and Development Servicing Bylaw also establishes professional requirements for the design of water systems.  <u>Recommendation:</u> regulation be incorporated within the new Subdivision and Development Servicing Bylaw.</p>
<p>4.9.3 Waterworks systems shall be designed, fabricated and installed in accordance with good engineering practice and to the water standards as set by the Regional District.</p>	<p>The regulation does not provide sufficient guidance and is structured as a guideline making difficult to assess compliance and/or enforce.  <u>Recommendation:</u> regulation be deleted.</p>
<p>4.9.4 Potable water shall be distributed to:            a) each manufactured home space; and            b) standpipes or hydrants, if required.</p>	<p>The provision of adequate water supply for a proposed development is a requirement of the Draft Subdivision and Development Servicing Bylaw.  <u>Recommendation:</u> regulation be deleted.</p>
<p>4.9.5 The design and installation of the waterworks system shall be approved by the Regional District.</p>	<p>The provision of adequate water supply for a proposed development is a requirement of the Draft Subdivision and Development Servicing Bylaw. If a MHP is required to connected to a community system, which would be supportive of existing objectives in the RGS and electoral area OCP bylaws, this requirement becomes moot. Similarly, the regulation of private utilities, if pursued, will have implications for this regulation.  <u>Recommendation:</u> regulation be deleted.</p>

Attachment No. 11 – Overview of Section 4.10 (Sewage Treatment and Disposal Systems)

Bylaw Section Number	Comments
<p>4.10.1 The owner of a manufactured home park shall provide for the disposal of all wastewater effluent that is generated within the manufactured home park by providing a community sewage system connected to all plumbing fixtures and sewage laterals in the manufactured home park.</p>	<p>The provision of adequate waste water disposal for a proposed development is a requirement of the Draft Subdivision and Development Servicing Bylaw. If a MHP is required to be connected to a community system, which would be supportive of existing objectives in the RGS and electoral area OCP bylaws, this requirement becomes moot. Similarly, the regulation of private utilities, if pursued, will have implications for this regulation.</p> <p><u>Recommendation:</u> regulation be deleted.</p>
<p>4.10.2 The community sewer collection system design must be prepared under the direction of a design professional who has the appropriate experience and is registered with the Association of Professional Engineers and Geoscientists of BC.</p>	<p>This is considered to be a submission requirement and not a design standard.</p> <p><u>Recommendation:</u> regulation be deleted.</p>
<p>4.10.3 This community sewage system shall be designed, fabricated and installed in accordance with good engineering practice and to the sewer standards as set by the Regional District. The design and installation of a private sewage system shall be subject to the approval of the Regional District and the applicable provincial agency.</p>	<p>It is not clear what the Regional District considers to be “good engineering practice” or which standards set by the Regional District are to be referred to (presumably the Subdivision Servicing Bylaw). Reference to approval by a provincial agency is seen to be a third party condition and possible unlawful delegation of Board authority – if standards being approved have been adopted by RDOS Board. If standards being referred to are provincial legislation / guidelines, this does not need to be repeated in the bylaw.</p> <p><u>Recommendation:</u> regulation be deleted.</p>
<p>4.10.4 In each manufactured home space a lateral sewer terminus shall be gas-tight, protected from mechanical damage and protected from storm water infiltration.</p>	<p>The current Subdivision Servicing Bylaw does not appear to establish this standard for other forms of development.</p> <p><u>Recommendation:</u> regulation be deleted.</p>
<p>4.10.5 For the purpose of determining pipe sizes, each manufactured home space shall be considered as having a hydraulic load according to requirements of the BC Plumbing Code.</p>	<p>Current Subdivision Servicing Bylaw establishes pipe sizes for service connections.</p> <p><u>Recommendation:</u> regulation be deleted.</p>

Attachment No. 12 – Overview of Section 4.11 (Garbage Disposal)

Bylaw Section Number	Comments
<p>4.11.1 The owner of a manufactured home park shall dispose or arrange for disposal of garbage or refuse.</p>	<p>Regulation does not state how this is to occur, arguably incinerating or burying refuse on site satisfies requirement. <u>Recommendation</u>: regulation be deleted.</p>
<p>4.11.2 If the owner of a manufactured home park establishes one or more garbage disposal areas within the park for the collection of garbage and refuse, he shall:</p> <ul style="list-style-type: none"> <li>a) provide fly-tight metal containers in ample number;</li> <li>b) maintain the containers so that they shall not become foul-smelling, unsightly, or a breeding place for flies;</li> <li>c) screen the depot with shrubs, trees or fencing from adjacent manufactured home spaces.</li> </ul>	<p>The regulation does not provide sufficient guidance (i.e. it is not clear what constitutes a “fly-tight metal container” or what is meant by “ample number”) and is structured as a guideline making difficult to assess compliance and/or enforce (e.g. regulation commences with a reference to “If”). <u>Recommendation</u>: regulation be deleted.</p>
<p>4.11.3 If garbage is to be disposed of on the site, the methods and locations shall be in accordance with the <i>Pollution Control Act</i>.</p>	<p>The regulation refers to a separate statutory/regulatory standard (i.e. provincial <i>Pollution Control Act</i>) and does not need to be repeated in an RDOS bylaw. <u>Recommendation</u>: regulation be deleted.</p>



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Attachment No. 13 – Overview of Section 4.12 (Fire Hydrants)

Bylaw Section Number	Comments
<p>4.12.1 Fire hydrants meeting the requirements of the Regional District shall be installed and connected to the internal water supply of a manufactured home park such that no manufactured home space is beyond 120.0 metres from a fire hydrant, as measured along the internal and/or external roadway system.</p>	<p>The current Subdivision Servicing Bylaw requires that, where a community water system is available, fire hydrants be spaced no greater than 250 metres apart and that no residence shall be further than 300 metres from a fire hydrant.</p> <p>In “high density” residential developments, the maximum distance from a hydrant is 150 metres, or as accepted.</p> <p>NOTE: A manufactured home park is considered to be a “low density” residential form of development.</p> <p><u>Recommendation</u>: regulation be made consistent with current Subdivision Servicing Bylaw and incorporated in new Subdivision and Development Servicing Bylaw.</p>

Attachment No. 14 – Overview of Section 4.13 (Street Lighting)

Bylaw Section Number		Comments
.1	<p>Street lighting shall be installed and maintained to adequately illuminate the traveled portion of the roadway at the following locations:</p> <ul style="list-style-type: none"> <li>a) the intersection of access roads and public highways;</li> <li>b) all internal intersections;</li> <li>c) the turning circle of cul-de-sacs;</li> <li>d) any point at which an internal roadway changes direction 30° or more; and</li> <li>e) pedestrian walkway entrances.</li> </ul>	<p>The regulation does not provide sufficient guidance (i.e. it is not clear what is meant by “adequately illuminate the traveled portion of the roadway”) and is structured as a guideline making it difficult to assess compliance and/or enforce.</p> <p>Also is contrary to recent direction adopted by RDOS Board in relation to the provision of street lights more generally.</p> <p><u>Recommendation</u>: regulation be deleted.</p>