



June 6, 2018 Open House

Secondary Suites and Accessory Dwelling Units

Other Public Comments

...received until July 4, 2018

<u>N.B.</u> Some of these comments have been modified to remove identifying information.	
1	Just wanted to voice our opinions as to the fact that (we) are both in favour of permitting accessory dwelling units as well as secondary suites. With X acres in paradise it would be lovely to share our space.
2	<p>I am writing with some comments on the proposed legalization of secondary suites in the district of Highlands.</p> <ul style="list-style-type: none"> • While I agree it would be nice to create more affordable housing in the Highlands, aspects of the infrastructure in the District present problems which should be considered. • First, almost all the homes in the Highlands rely on well water. With increased population comes increased water consumption. How much increase in population can our fractured bedrock water supply without running dry? • Second, the original houses have septic systems sized to the size of the original dwelling. Can we be sure our septic systems can handle the increased load provided by the increase in population? • There has been a lot of talk and bylaws of limiting the density in our community and legalizing secondary suites could quite possibly double our population. • The rural nature of the Highlands, and the lack of infrastructure, make our community very different from communities that have piped water and sewer.
3	As there are already a number of existing suites throughout the Highlands it only seems fair to legitimize the existing ones and allow the small percentage of owners who wish to accommodate a growing need. Any new suite, should of course be inspected for the safety of the tenant and surrounding area. Owners should be respectful to surrounding properties, i.e. noise and disturbances.
4	<ul style="list-style-type: none"> • After reading the reports provided to Council on December 4, 2017 and April 16, 2018, I see the exact same issues without any change at all (over the past 25 years). If the original council of the day or even 2 councils after that had taken a clear stand complete with the steps necessary to implement a plan we would not have 30% to 50% of the properties in the Highlands with illegal suites. 95% of these suites would be to code and legal. • I did not see anywhere in the reports or information provided by staff referencing the properties which have 2, 3, and some up to 5 suites ... I feel that in reviewing this topic no more than one unit per property should be allowed. • I think that during these times, where people are trying to survive emotionally, financially and physically that the Highlands has a great opportunity to participate to use existing resources to match the needs of various people to obtain a win-win situation. <ul style="list-style-type: none"> ○ As we all age, the amount of work associated with living in large houses built many years ago, or on an acreage can be overwhelming or unrealistic. ○ Or...the existing properties and acreages are too large for (land owners) to even want to have to maintain on their own but with help would work out great. ○ Not in all situations but in many, people living in a rural setting like the Highlands, a tenant can provide: <ul style="list-style-type: none"> ▪ Additional security ▪ Financial help for both parties ▪ Sometimes even transportation savings ▪ Help with maintenance ▪ Companionship • In many of the sustainability discussions I remember a triple net gain, social, economic and

	<p>environmental. To me it seems like secondary suites and accessory dwelling units in a rural environment fits this test.</p> <ul style="list-style-type: none"> • An enforcement strategy was mentioned in both reports provided to council. My main concern is the District of Highlands Bylaw Enforcement Procedure Policy 11-141 adopted January 25, 2016. <ul style="list-style-type: none"> ○ The policy states: “The District of Highlands has no duty to take enforcement action with respect to every contravention of a bylaw that may occur within its jurisdiction. The District will use discretion on a case-by-case basis to evaluate contraventions, and take reasonable steps to investigate contraventions in accordance with the policy and operations guidelines of the District.” ○ Further, “Section 2 – Process” within this policy states, “...the District like most municipalities, relies primarily on public complaints to identify potential non-compliance...” • I find this policy does not provide a solution it creates additional problems unlike a well written bylaw and equal enforcement for all. I think equal enforcement to all is a more realistic approach to compliance. I would truly like to eliminate the “no fly zone” property designation which is sometimes achieved by contributing to a community project, being in the right place at the right time. • Now, I urge Mayor and Council to have the courage and strength to put a plan in place to deal with this long unresolved issue and for Mayor and Council help restore the Highlands to a location which we can all live together, enjoy and help our neighbours and community. I remember when we checked in on each other as neighbours, helped when projects were being done. I feel it’s time to restore the sense of community not just in one or two pockets within the Highlands but the entire area. It’s time to end the policy of rewarding complainers and truly acknowledge and reward the residents which contribute and do things right.
5	<p>A few thoughts on the secondary dwellings subject.</p> <ul style="list-style-type: none"> • First I would like to thank the Highlands for moving ahead on this subject, it has been a long time coming and there are many including myself who have been patiently waiting for this to become a reality. I feel it is needed in our community. It is my hope that by going through everything that has to be done to make this happen, we think hard on making this outcome something that actually works for the people without the need to come to the district for changes and exemptions. • I would like to address the secondary dwellings subject only as I don’t have any real opinion regarding secondary suites in existing dwellings but I am happy that we are moving to accommodate what is already happening in our community. <p>Secondary dwellings.</p> <ul style="list-style-type: none"> • My thoughts are that the permitted size of the secondary dwelling should be partially determined by the size of lot. Reason for this is simple in my mind, the larger the lot the less impact a larger residence would be. • When we talk about a detached, secondary dwelling I feel that this would likely occur on a larger lot (say perhaps 5 acres or more). • My thought would be if you had 5 or more acres you could build a dwelling of up to 1200’ • If you had 10 acres or more you could have a secondary dwelling of up to 2000-2400’. • If you had 30 acres or more the secondary dwelling could be even larger. • This graduated size would assist those who are deeply invested in the community to help make it affordable and in some cases for family requirements. • The notion of the 968 square feet size is too small regardless of acreage size in my opinion for a detached secondary dwelling. If you take a house with a bedroom, ensuite, closet, common

	<p>bathroom, kitchen, dining , living, laundry rooms and space for some storage you will be hard pressed to make that happen under 1200'. A dwelling should as well have accommodations for a second bedroom for company. This then would be virtually impossible at 1200' let alone 968'.</p> <ul style="list-style-type: none"> • There was mention of a 40% size comparison to the main residence. The problem with this idea is that the main residence needs to be quite large so that a reasonable sized secondary dwelling can be achieved. My feeling personally and I feel that it is a desire of the Highlands is to not promote large monster houses. So one way to allow for two reasonable sized houses on a property is to simply remove the 40% part of the equation. • As well, there is a possibility that a new “secondary “ dwelling that would be built on a property would actually end up being the primary dwelling and the existing dwelling would end up being the secondary dwelling. Bottom line is that if there is a size limit on the primary dwelling and a size limit on the secondary dwelling the land owner can determine that upon completion, which residence the primary and which is the secondary. (Example would be that the existing house would be small enough to meet the requirements for the secondary dwelling) <p>In short.</p> <ul style="list-style-type: none"> • Larger the lot the larger the secondary dwelling. • No 40% rule • Make the sizes large enough to meet the needs and desires for the common landowner. Houses need to be just that, houses. With all amenities of a normal house. • Not cabins.
6	<ul style="list-style-type: none"> • Regarding page 16 of the Nov. 29, 2017 staff report and #6 on that page which states: “In many cases property assessments reflect the presence of a suite whether they are authorized or not.” That information was checked with BC Assessment Authority staff and it appears that is not the case. Such information was further checked online using a specific code for secondary suites and also found not to be the case. • How would the District deal with the properties that already have more than one secondary suite / accessory dwelling units? • How would the District fund the potential required staffing resources that staff reports have indicated would be needed if secondary suite/accessory dwelling units were to be legalized? • Some financial information would be good to have and the potential options of where to cover those costs might come from. • How can the District ensure a user pay system? • Is it possible each residential property tax could be increased to cover the increase in staff workload if secondary suites / accessory dwellings were legalized? • The majority of municipalities that have legalized secondary suites are likely receiving CRD Water which of course is a much different situation than in the Highlands with a vast majority of homes on individual domestic well water resources. The risks and threats are therefore greater. There are already homes in the Highlands with greatly reduced water supply for domestic purposes in the spring, summer and early fall months for the past several years. Some homes even have the very reduced levels of water in the spring having to significantly alter their activities and lifestyle. This is a real concern in the Highlands which may be due to existing secondary suites water use and climate change. • Will the District be responsible for lack of domestic well water due to going beyond the carrying capacity by development and water use in the municipality if secondary suites / accessory dwelling units are legalized?

<ul style="list-style-type: none"> ● RE: Draft Zoning Bylaw Amendments for Secondary Suites: <ul style="list-style-type: none"> ○ On #6, “Island Health requirements for sewage disposal and potable water must be met by all new secondary suites.” Question: Why wouldn’t all existing secondary suites also have to meet the Island Health requirements for sewage disposal and portable water? (See staff’s April 11, 2018 report: 2. Potable Water and 3. Sewage and Grey Water Systems) and staff November 29, 2017, page 5, #4. The above question is also applicable to #9 under Draft Zoning Bylaw Amendments for Accessory Dwelling Units. ● RE: Draft Zoning Bylaw Amendments for Accessory Dwelling Units: <ul style="list-style-type: none"> ○ In #8, “Require buffering or screening where privacy...” I recommend inserting the word “vegetative” before the word buffering ○ I further suggest that both secondary suites / accessory dwelling units must comply within the provisions of any existing covenants, be incorporated ● Will the District seriously consider the observations and reporting in the Golder Report Phase 3 regarding domestic well water supply in the Highlands that speaks to homes at higher elevations being at additional risk in the dry season? ● In light of Appendix C, Phase 3 of the Golder Report and, the 1999 Highlands Housing Task Force Report, the District should reconsider the report’s objectives and its recommendations and, in particular revisit the Task Force’s comments and rationale on the matter of “lot size”. ● I am not positive of what the present health and safety concerns are for the District on secondary suites and accessory dwelling units? Or, what the statistics or proof are towards those concerns and how potential legalization of secondary housing might actually “really” change any of that? Since there are no assurances that owners will obtain permits or contact Island Health regarding their jurisdiction of authority, etc. ● To be seriously considered and fair to all property tax payers a full cost recovery system would need to be in place first where the owner of secondary housing would pay for all associated costs and therefore, not cost the taxpayers that do not have secondary housing any monies at all. ● The 1999 Housing Task Force report on page 6 states their survey (at that time) indicated that 43% of owners would construct secondary housing if it were permitted. One could assume now that that percentage of owners would be higher, and could lead towards a slippery slope in respect to loss of privacy, noise, increased water demands and sewage disposal capacity and increased local traffic in addition to the impacts of mitigating for climate changes and the impacts of that towards water resources, especially during June, July, August and September. ● There should be serious consideration of aquifer recharge areas. If secondary housing were to be considered it should only be for one unit and only on a lot of 5 acres or more. ● Before deliberate consideration of proceeding in this process, the District must be positive in the knowledge that Highlands’ future long term water supply from surface water and ground water is sustainable and ensured, that is paramount. If the District cannot ensure that, then to proceed with a blanket zoning to permit secondary housing would be very unwise. ● Perhaps a housing strategy with phases and small steps taken over time rather than a giant leap into the unknown with a potential blanket zoning change would be safer and a cautionary approach. ● Additional public engagement and consultation with sufficient information being provided should occur to be truly meaningful. ● Due diligence is required.
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