

Association for the Protection of Rural Metchosin

#2-4401 William Head Road

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August 20, 2022

Sent by email

Mayor and Council
District of Metchosin
4450 Happy Valley Road
Victoria, BC V9C 3Z3

Dear Mayor Ranns and Council:

Re: Bylaw amendment to support tiny homes and RVs as additional dwellings

While recognizing that there are significant housing affordability pressures in the broader Capital Regional District, the APRM sees serious issues with a bylaw amendment change that would allow for impermanent alternative dwellings (i.e. tiny homes, RVs) within Metchosin.

Contrary to the community's rural character

Metchosin's community character has been formed over the decades through a focus on **large rural lots and a sustainable rate of population growth** that accords with the actual carrying capacity of the environment, including our groundwater resources.

A vital community ethic is the commitment to **protecting and maintaining agricultural lands and wildland habitat from development**. That commitment to a low population is reflected in the fact that we are **not connected to the regional sewer system**. This is expressed in our Official Community Plan and in a community character that has endured for decades.

Metchosin's geographic realities mean that the District is **far from an ideal location to develop affordable housing options**:

- There is little employment located in the District.
- Public transit is offered on a limited basis.
- Metchosin's rural nature means that there can be significant distances between individual homes and amenities like schools, shopping and health care, as well as workplaces.

Fiscal implications

As RVs and tiny houses on wheels are not considered permanent structures, **there would be no applicable taxes at the municipal level in allowing these alternative structures to serve as dwellings.** The property owner may be taxed federally on the rents they receive and declare, but that will not impact municipal taxes. Thus, a bylaw amendment to allow tiny homes and RVs could see our population increase significantly, while the ability to pay for services (like policing) would remain stagnant. This would essentially create a situation where residents living in permanent homes are subsidizing those living in alternative dwellings.

By contrast, Metchosin's existing provisions for secondary suites contain opportunities for new housing in the District. Those provisions allow for housing to be developed in a planned manner, with the improvements reflected in property taxes.

Achieving affordable housing goals uncertain

We question whether this approach will actually serve those impacted by housing affordability issues. The proposal appears to be based on the premise of having socially conscious private landowners being willing to 1) host or supply alternative housing; and 2) ensure that such housing actually goes to those worthy of that alternative housing; and, 3) ensure rents remain affordable.

It's not possible through a local bylaw to compel private landowners to rent to those most in need or require a screening process for possible tenants, such as one might see with social housing programs. What is proposed is a program that is driven by social objectives, but which will not have any corresponding administrative structure or mechanism to support the achievement of those objectives.

What could actually result from such a program is that it creates opportunities for private landowners to develop short-term vacation rental suites, rental spots for RVs or fifth wheels, or simply more rental units that reflect the high costs we see elsewhere in the CRD.

Environment, health and safety issues vs. District resources

The management of water, sanitation and utilities raises serious concerns, particularly with septic hook-ups and overall system management. In theory, bylaws could be established to allow for services to temporary housing units. However, the practicality of managing sewage and other services on a day-to-day basis would be highly challenging; it's not a function that the District has the resources to undertake.

Metchosin's past contribution to additional housing

Metchosin has already made a major contribution to providing land for affordable housing. Recall that the 2017 land swap between Metchosin, Langford and Beecher Bay resulted in 350 acres of land being withdrawn from Metchosin and placed into Langford's jurisdiction. Of this, almost 80 acres will be used for the development of a high density, cluster housing - upwards of 280 new homes.

We urge Council to not move ahead with amending the Land Use Bylaw. Introducing ad hoc housing solutions will have potential serious and adverse impacts on Metchosin's rural character, natural environment, and municipal finances.

Sincerely,

Jay Shukin

President, Association for the Protection of Rural Metchosin

CC: APRM Executive