



September 19, 2017

Melanie Steppuhn, BES, BCLA
Land Use Planner
1435 Water Street
Kelowna, BC V1Y 1J4

Dear Ms. Steppuhn,

RE: Application for Non-Farm use: file #A17-0006, 3317 McCulloch Rd, Kelowna, BC.

Thank you for the opportunity to provide comments for City of Kelowna Staff and Council consideration of ALC application for non-farm use in the ALR. It is our understanding the applicant is applying for non-farm use to support a permanent RV park in ALR as an affordable housing option. The RV park currently has approval to operate seasonally for agri-tourism. This ALC application has been reviewed from Healthy Food Systems, Healthy Built Environment and Public Health Protection perspectives. The following information is provided for your consideration.

Healthy Food System

Interior Health has an interest in the preservation of farmland to support local agricultural capacity now and in the future. Agricultural capacity is a key aspect of local healthy food systems, contributing to community food security. Food systems determine how we choose food and what food we have access to. The food we eat is critical to our health. Land use decisions can influence use of agricultural land which can thereby impact the accessibility, quality and variety of food available to us. Having access to healthy and safe food helps to protect the population from chronic disease and infectious illnesses.

- It appears that this application for non-farm use in the ALR will not increase food security. Food security has been recognized as a key public health issue by the BC Ministry of Health. Interior Health ensures the delivery of key government priorities to increase and advance food security.
- Any non-farm uses in the ALR should support agricultural capacity and provide significant benefit to agriculture. The operation of RVs parks in the ALR has the potential to negatively impact agriculture.

Healthy Housing

- Interior Health and the City of Kelowna are currently in the process of developing a Health Housing Strategy with a focus on affordability and supply and rental housing market. We recognize that vulnerable people need appropriate, affordable and safe housing.
- The proposed use of the RV park as an affordable housing option in Kelowna does not align with healthy neighborhood design and health housing planning principles:

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Interior Health
Every person matters

- Having access to a variety of amenities within close proximity of home makes active transportation or recreational physical activity more convenient. The proposed permanent RV park is outside the Permanent Growth Boundary, which would make accessing amenities with active transportation more difficult.
 - Ensuring adequate housing quality for all segments of society. Poor quality housing is characterized by hazards that increase the risk of unintentional injuries such as burns and physical trauma. This can be prevented by ensuring that people live in good quality housing, which will largely benefit people of low socioeconomic status who generally live in poor quality housing. Living in adequate quality housing is strongly associated with an increased sense of safety, decreased crime, and improved social connections, when compared to living in poorer quality housing. These factors help people enjoy better health and improved quality of life. The proposed RV park may not provide good quality housing for people of low socioeconomic status.
- **If this application is denied, it would be important to work with the current tenants to find appropriate, affordable and safe housing options.**

Public Health Protection

A review of our files indicates that this property is not connected to community servicing. Please note that the applicant must meet the requirements of the BC Sewerage System Regulation (SSR) for onsite sewage disposal. The application outlines concerns around high water table and how this affects the ability for the RV's to come and go at certain times in the year. Permanent residency will require adequate sewage disposal for the RV's on site. High water table limits the ability of the land to adequately and sustainably treat sewage. It is recommended that an Authorized Person under the SSR assess the site and determine whether there are adequate conditions and space to place a primary and reserve type 1 trench septic system designed for the flows from the proposed RV's.

In addition, any water system which services two or more connections meets the definition of a water supply system under the BC Drinking Water Protection Act (DWPA) and must meet all requirements of the Act and Regulation. Requirements include, but are not limited to, obtaining Source Approval, a Construction Permit, and an Operating Permit from the Interior Health Authority.

On behalf of the Health Communities portfolio, I appreciate the opportunity to provide comment on the aforementioned application.

Kind regards,

Jill Worboys, RD
Public Health Dietitian

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