



Interior Health
Every person matters

October 30, 2023

Ben Kent, Planner
Regional District of Okanagan-Similkameen
101 Martin Street,
Penticton, BC V2A 5J9

email sent to: planning@rdos.bc.ca

Dear Ben Kent:

**RE: Temporary Use Permit to allow for the residential use of one recreational vehicle
8200 Princeton-Summerland Road, Lot D, Plan KAP28315, DL 2893, ODYD
File: F2023.028-TUP**

Thank you for the opportunity to provide feedback for the temporary use permit (TUP) application to allow temporary residential use of one recreational vehicle (RV) on the subject parcel. The information provided states the RV will not be connected to a drinking/domestic water supply nor a sewerage system.

Overall, I have no objections to temporarily allowing residential use of a RV as long as *Health Hazard Regulation* requirements are met. I appreciate the need to be flexible and innovative during this extra-ordinary province-wide (country-wide) housing situation. It is important for anyone considering 'living' in an RV (or allowing others to live in RVs) to understand **RVs do not meet housing quality standards** and have health and safety hazards different than typical homes, and **landlords have a responsibility** under the *Health Hazards Regulation* **to not create a health hazard**. I trust the information and resources I provide below will be useful for considering this TUP application, and mitigating potential harms.

Balancing Aspects of Healthy Housing:

Housing is a key determinant of health. It has a significant influence on our physical and mental health, social well-being, and indirectly influences our ability to achieve what we need to live a healthy life. Healthy housing is affordable, safe from hazards, appropriate and in a location that meets our needs. Ideal housing achieves all of these principles. However, we recognize that in trying to balance these aspects of housing families often must be satisfied with not achieving one or more principles well, in order to achieve the others. I recognize this is likely the current scenario on the subject parcel. Balancing the health outcomes and health risks of housing is very important. Temporarily allowing RVs to be used as housing would allow more time to find and/or develop homes that are safe, appropriate and suitable in the long-term, which must remain the ultimate objective.

Health and Safety Risk of Residential Use of RVs:

It is important to understand that RVs are designed to accommodate people while pursuing short duration recreational activities (e.g. camping), and do not meet quality standards for living-in longer-term. The [TNRD info sheet about RV dwelling](#) explains this difference. RVs pose significant safety hazards. The more time a person spends in the RV the higher the chances of being exposed to a hazard(s), which significantly increases the risk of harm or poor health outcome. The following are examples of potential hazards associated with RVs:

- Gastro-intestinal illness due to unsafe drinking water, improper/inadequate (warm) food storage, or cross-contamination from touching sewage/wastewater on the ground or while servicing holding tanks;

Bus: (250) 253-3679
Email: Anita.ely@interiorhealth.ca
Web: www.interiorhealth.ca

POPULATION HEALTH
851 – 16 St NE, Box 627
Salmon Arm, BC, V1E 4N7

- Burns, physical trauma or death from fire and carbon monoxide and propane poisoning, especially while using heating, electrical and cooking appliances;
- Mental health impacts or physical trauma or death from exposure to extreme heat or cold.

Mitigating Health and Safety Risks:

I strongly encourage the RDOS and families considering using an RV as a housing option to take actions to mitigate all risks; that is, reduce these hazards and the likelihood they could occur. For examples by:

- Providing information/being aware of the hazards;
- Creating/routinely using a safety checklist to ensure all systems are operating properly, such as electrical, heating/cooling and propane systems; and
- Creating a condition of permit/regularly testing the RV unit has two operable emergency exits, and fire, carbon monoxide and propane gas monitors.

Also, note section 7 of the [Health Hazards Regulation](#) (BC Reg. 216/2011) requires landlords to provide tenants with potable water for domestic purposes, a minimum of 11 m³ of airspace per tenant and a window that can be opened. This TUP proposal is for the occupants of the RV to use water and sewage facilities in the principal dwelling. This would satisfy the intent of the *Health Hazards Regulation* as long as access to these facilities is readily available. I note on the site plan that the proposed RV location is relatively distant from the principal dwelling, which would inhibit regular use of the personal hygiene facilities (i.e. think toilet and handwashing during inclement weather). **I strongly recommend the RV be located immediately adjacent** to the principal dwelling in order to reasonably use the facilities. In addition, the RV must have a window that can be opened and be large enough to meet the minimum airspace requirements, which are to protect against contagious respiratory illnesses. All food should be prepared where there is a source of water and wastewater for sanitation purposes.

In summary, I have no overall objections to allowing residential use of a RV temporarily with the condition the landlord achieves the *Health Hazards Regulation* requirements; namely feasible access to sanitary (water) facilities, adequate airspace and a window that opens. I recognize all aspects of healthy housing are not always achievable, and families must find the balance that best fits their situation. However, I am very concerned about the health and safety of anyone using RVs as a residence. As such, it is important people understand the associated health risks, and take actions to mitigate the hazard and likelihood of them occurring as much as possible. Although the TUP is for 3 years, I strongly encourage a more safe housing option be found as soon as possible.

We are committed to collaborating with the RDOS to support healthy community planning. Below are some resources, which the RDOS and/or the applicant may find useful. If you have any questions, comments or require more resources please feel free to contact me directly at 250-253-3679.

Sincerely,



Anita Ely, BSc, BTech, CPHI(C)
Specialist Environmental Health Officer
Healthy Communities, Healthy Families

AE/ae

Resources:

TNRD Info Sheets about RV Dwelling and 'Tiny House' Use
<https://tnrd.civicweb.net/filepro/documents/165703/>

Windsor, Ontario Fire Department, Recreational Vehicle (RV) Fire Safety Guidelines
<https://www.windsorfire.com/recreational-vehicle-rv-fire-safety-guidelines/>

Technical Safety BC, On the road again: Keeping your RV safe
<https://blog.technicalsaftybc.ca/road-again-keeping-your-rv-safe>