



WEST HANTS REGIONAL MUNICIPALITY REPORT

Information <input type="checkbox"/>	Recommendation <input checked="" type="checkbox"/>	Decision Request <input type="checkbox"/>	Councillor Activity <input type="checkbox"/>
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To: Mayor Zebian and Members of West Hants Regional Municipality Council

Submitted by: _____
Sara Poirier, Planner

Date: 2021-04-27

Subject: File # 20-28 D: WHLUB Text Amendment: 234 Mountain Rd, Three Mile Plains; PID 45213758

LEGISLATIVE AUTHORITY

Municipal Government Act Section 210.

POSSIBLE MOTION

Should Council wish to approve the text amendment to allow mobile homes in the Two Unit Residential (R-2) zone of the Three Mile Plains Growth Centre following completion of the Public Hearing, the following motion would be in order:

...that Council gives Second Reading to and approves amending the text of the West Hants Land Use By-law to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone in a manner substantively the same as the draft set out in Attachment A of the Planning and Heritage Advisory Committee report regarding File#20-28 dated March 11, 2021.

BACKGROUND

An application was received from Mr. Jack Lantz and Ms. Aletha Lantz to permit mobile homes in the Two Unit Residential (R-2) zone of the Three Mile Plains Growth Centre which would allow the applicants to apply for development and occupancy permits for the mobile home they have placed on their property at 234 Mountain Road, Three Mile Plains.

A Public Information Meeting (PIM) was held virtually and broadcast live on the Municipal Facebook page on February 18, 2021 to consider the requested amendment (Appendix A).

On March 11, 2021 staff presented a recommendation report to the Planning Advisory Committee / Heritage Advisory Committee (PAC/HAC) (Appendix B). The PAC/HAC recommended in favour of the amendment.

Council held first reading on March 23, 2021.

NEXT STEPS



*anticipated dates; final dates will be set by Council

APPENDICIES

Appendix A 2021-02-18 Public Information Meeting Notes – File 20-28 A

Appendix B 2021-03-11 Staff Report – Land Use By-law Text Amendment: 234 Mountain Rd, Three Mile Plains; PID 45213758; File #20-28

Report Prepared by: _____
Sara Poirier, Planner

Report Reviewed by: _____
Madelyn LeMay, Director of Planning and Development

Report Approved by:  _____
Mark Phillips, CAO

Attachment A

Public Information Meeting Notes

February 18, 2021

File 20-28 A

234 Mountain Road, Three Mile Plains; Land Use By-law Text Amendment, Mobile Homes in the Three Mile Plains Growth Centre

Meeting date and time	A virtual Public Information Meeting was held on February 18, 2021 beginning at 6:00 p.m. The meeting was live broadcast on the Municipal Facebook page.
Attending	In attendance: One (1) Councillor: <ul style="list-style-type: none">• Councillor Francis Three (3) members of staff: <ul style="list-style-type: none">• Director LeMay• Planner Shah• Planner Poirier Doug Symonds (Resident) As this meeting was held virtually other members of the public viewed the meeting on Facebook.
Applicant Overview	Planner Poirier outlined the request from Mr. Jack Lantz and Ms. Aletha Lantz to permit mobile homes in the Two Unit Residential (R-2) zone of the Three Mile Plains Growth Centre which would allow the applicants to apply for development and occupancy permits for the mobile home they have placed on their property at 234 Mountain Road, Three Mile Plains.
Comments	Comments from the public could be submitted to Planner Poirier by mail, e-mail and telephone. Twelve (12) residents provided written comments. Emails and letters are attached. Staff responses are included in purple. Five (5) Facebook comments and three (3) verbal comments were received from the public. All five (5) Facebook comments were in favour of the application. Two (2) of the verbal comments received were in favour of the application; one (1) was against the application citing that this amendment would not be in the best interest for the community. Questions from the public included:

	<ul style="list-style-type: none">• What are they using for sewer and water? If the amendment is approved and mobile homes are permitted in Three Mile Plains Growth Centre, the property owner would apply to be connected to municipal water and sewer, unless they already have an approved on-site system.• Are they paying any taxes to West Hants? If this change were to be made, how would these mobile homes be taxed? Every property owner in West Hants pays property taxes to the Municipality based on the assessed value of the property. If the amendment is approved, and a resident of the Three Mile Plains Growth Centre places a mobile home on-site, Property Valuation Services Corporation (PVSC) would assess the property value based on the residential use (e.g., going from a vacant lot to placing a mobile home on-site) and they would be taxed according to that assessment.• I was just wondering if the comments regarding the proposed changes in Three Mile Plains can come from anyone or just residents of the area? Any resident in West Hants Regional Municipality is welcome to comment on the proposed amendment in Three Mile Plains.• Are you able to explain what this amendment means? Would people who currently own property in Three Mile Plains be putting mobile homes on their land and renting them out? The Two Unit Residential (R-2) zone in West Hants (excluding Hantsport and Windsor) currently permits single unit dwellings, two-unit dwellings, mini homes, accessory apartments and existing manufactured homes (which includes existing mobile homes and mini homes). The proposal being considered for Three Mile Plains is to add "mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone. If the amendment is approved it would permit anyone with a vacant lot in Three Mile Plains that is zoned Two Unit Residential (R-2) to place a mobile home on site. This would not allow anyone with an existing dwelling on a lot
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zoned Two Unit Residential (R-2) in Three Mile Plains to put a mobile home on site unless the lot is large enough to be subdivided; this is based on other policies that we have regarding one main building on the lot in residential zones.

- I am also curious as to the reasoning to not allow mobile homes. Is it an aesthetics issue? There is currently no reason given in the text of the West Hants Municipal Planning Strategy as to why mobile homes were not permitted in the Two Unit Residential (R-2) zone but mini homes were, other than Council wanting to consider mobile homes in mobile home parks in the Growth Centers (Falmouth and Three Mile Plains) by development agreement.
- There was a mobile on the property for 30+ years, wouldn't this fall under the grandfather clause?
The property was purchased as a vacant lot by the property owner in 2019. They have confirmed that the lot was vacant for at least the last 6-8 years. The Land Use By-law currently permits "mini homes" and "existing manufactured homes" which includes existing mini homes and existing mobile homes in the Two Unit Residential (R-2) Zone. This means that new mini homes are permitted to be placed on site but new mobile homes are not. As this mobile home was newly placed on the Mountain Road property in 2020 it would not be permitted as per the current planning documents. This is the reason the property owner has applied to amend the current planning documents to have Council consider adding "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) Zone.

Discussion points included:

- Housing affordability and accessibility
- Aesthetics
- Current background statements for the Three Mile Plains Growth Centre stating mobile homes should be considered by development agreement in a manufactured home park

	<ul style="list-style-type: none">• Property values• Municipal Services• Taxes
Adjournment	The presentation portion of the Public Information Meeting ended at 6:08 p.m.; comments could be submitted by mail, e-mail, telephone, or be dropped-off to the Municipal Office to Planner Poirier between February 18 and March 10, 2021.

Public Email Responses Submitted for the Application PIM

From Doug Symonds - February 14 and February 19, 2021

Dear Sara Poirier:

I saw this on the WWH website: "We would like your input on a proposed West Hants Land Use By-law text amendment to consider adding "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone"

Could you please direct me to the text of this proposed amendment?

It is unclear to me how mobile homes would fit into the R-2 zoning.

If the proposed change means that someone can buy a lot in the Three Mile Plains R-2 zone and put a "mobile" home on it, I am totally opposed.

I do not belong to Facebook. Can I still participate in the Virtual Public Hearing - 6:00pm Tues, Feb 23, 2021?

Thank you.

Doug Symonds, Three Mile Plains

Hi Sara:

I just finished watching the "PIM – Mobile Homes in Three Mile Plains" presentation via Zoom.

As I understand from the presentation, the owner(s) of the property at 234 Mountain Road put a mobile home on their property without the required permits (in violation of the R-2 zoning bylaw).

I am against having mobile homes added to the R-2 zoning for the Three Mile Plains growth centre as I think that they could potentially devalue existing properties. I think that prospective property purchasers in the Three Mile Plains area (or any other area) would be put off by the presence of bow-truss roofed trailers with tow hitches, ready to be moved at a moment's notice. It would definitely affect the "curb appeal" of the area. There are many vacant lots scattered along the main streets in the area, and if these lots were occupied by an influx of cheap trailers, it could have a significant negative impact on property values.

The owners at 234 Mountain Road should be required to move the illegal mobile home off the property. Also, what are they using for sewer and water? Are they paying any taxes to West Hants?

If this change were to be made, how would these mobile homes be taxed?

I'm not trying to be an elitist by any means, but I bought my house under the terms of the existing R-2 zoning, which is quite reasonable. A change like this to the zoning could have many negative effects.

Thank you for the work that you are doing.

Yours truly,

Doug Symonds, Three Mile Plains

Hi Sara:

The West Hants Municipal Planning Strategy, Section 5.3 (last revised December 25, 2018) specifically prohibits mobile homes, except as noted in the Section.

"5.3 Three Mile Plains Growth Centre – Residential Policies

A range of housing types and densities is considered appropriate for the Three Mile Plains Growth Centre. To allow for this, three residential zones will be applied: Single Unit Residential; Two Unit Residential; and Multiple Residential. The majority of residential land in the Three Mile Plains Growth Centre will be zoned Two Unit Residential (R-2) which permits one and two unit dwellings and mini homes. Mobile homes will not be permitted except in manufactured home parks which will be considered by development agreement. As in the previous planning documents, only the Hillcrest Drive and Kendall Lane areas will be zoned solely for single detached dwellings. New multiple residential development will be considered through rezoning."

I would suggest that Municipal Planning Strategy, as approved by the Minister of Service Nova Scotia & Municipal Relations, is a good plan and should be followed.

Thanks,

Doug Symonds, Three Mile Plains

From Cody Lantz - February 22 and March 4, 2021

Hello I hope you are having a great day so far. I was emailing to say that I am ok with Aletha lantz living in that trailer on mountain road. Thanks

Hello Cody,

I just wanted to clarify your comment on the application for 234 Mountain Road, Three Mile Plains. The amendment would be to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone. Are you okay with the potential for any property owner with a vacant property zoned Two Unit Residential in the Three Mile Plains Growth Centre putting a mobile home on site?

Thanks again for your comments.

All the best,

Sara

Yes, that would be fine.

From Jenn Upshaw - February 22, 2021

Good morning Sara,

I was just wondering if the comments regarding the proposed changes in Three Mile Plains can come from anyone or just residents of the area? I live in the growth area and I am for the proposed change. I am also working with a few groups looking to see what we can do to help with the housing situation right now. I am sure many of those people would support the proposed change as well but I do not want to ask them to comment if it will not count.

Thanks

Jenn Upshaw, Three Mile Plains

From Kayla Todd - February 22, 2021

Hi Sara,

I've been talking with Jennifer Upshaw and she mentioned an amendment currently taking place for Three Mile Plains regarding mobile homes. I'm wondering if you're able to explain what this means? Would people who currently own property in Three Mile Plains be putting mobile homes on their land and renting them out? I just want to be sure I understand as best I can. Also if people are for or against this do they send their emails directly to you?

Any and all information would be greatly appreciated.

Thanks and kind regards,

Kayla

Hi Kayla,

Thank you for your email. The Two Unit Residential (R-2) zone in West Hants (excluding Hantsport and Windsor) currently permits single unit dwellings, two-unit dwellings, mini homes, accessory apartments and existing manufactured homes (which includes existing mobile homes and mini homes). The proposal being considered for Three Mile Plains is to add "mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone. If the amendment is approved it would permit anyone with a vacant lot in Three Mile Plains that is zoned Two Unit Residential (R-2) to place a mobile home on site. This would not allow anyone with an existing dwelling on a lot zoned Two Unit Residential (R-2) in Three Mile Plains to put a mobile home on site unless the lot is large enough to be subdivided; this is based on other policies that we have regarding one main building on the lot in residential zones.

Yes, individuals can reach out to me either via email or phone until March 10. I will include all the comments I receive regarding this application in the Public Information Meeting notes for the Planning Advisory Committee meeting on March 11, 2021. I would ask that individuals include their name and street or community within the municipality at the end of the email or even over the phone. This provides Council a context for the comment. Prior to COVID-19, when the meetings were in person, we would be asking the individual to state their name and community before or after their comment/question.

Please let me know if you have any further questions.

All the best,
Sara

From Rob Kehoe - February 22, 2021

To whom it may concern,

I am in favor of the mobile home in TMP. I am also curious as to the reasoning to not allow mobile homes. Is it an aesthetics issue? Because I think a 74 year old woman not being able to live there because some people don't like the looks of mobile homes is absolutely ridiculous.

Hello Rob,

Thank you for your email. I will ensure your comments are included in the Public Information Meeting notes for the Planning Advisory Committee meeting on March 11, 2021.

There is currently no reason given in the text of the West Hants Municipal Planning Strategy as to why mobile homes were not permitted in the Two Unit Residential (R-2) zone but mini homes were, other than Council wanting to consider mobile homes in mobile home parks in the Growth Centers (Falmouth and Three Mile Plains) by development agreement.

All the best,

Sara

From Shawn Johnson - February 22, 2021

Hello,

I want to write in response to the information session the other evening.

The mobile home amendment in Three Mile plains.

I am voicing my concern and do not agree with the change for the following:

- 1) Stress on municipal services
- 2) Potential for trailer parks which I do not support. We have that already at the crossing.

3) Making the change for that would not benefit the community and by-laws do not need to be changed.

For the property highlighted you should just have a development agreement. Not a full zoning change. Site specific going further if need be.

Does not need to be a zoning change for 1 property. Moving forward these issues should be case by case respecting the current outlines already in place.

Thank you

Shawn Johnson, Three Mile Plains

From Brenda Church - February 23 and March 3, 2021

Hello,

I am more than fine with Aletha Lantz living in a trailer on Mountain Road.

Thank you for your time and attention to this matter,

Brenda Church

Hello Brenda,

I just wanted to clarify your comment on the application for 234 Mountain Road, Three Mile Plains. The amendment would be to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone. Are you okay with the potential for any property owner with a vacant property zoned Two Unit Residential in the Three Mile Plains Growth Centre putting a mobile home on site?

Thanks again for your comments.

All the best,

Sara

Yes, that would be fine.

From Rose Hawboldt - February 24, March 4 and 8, 2021

I am for this, there is no reason it can't be on the property.

Thank you
Rose Hawboldt

Hello Rose,

I just wanted to clarify your comment on the application for 234 Mountain Road, Three Mile Plains. The amendment would be to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone. Are you okay with the potential for any property owner with a vacant property zoned Two Unit Residential in the Three Mile Plains Growth Centre putting a mobile home on site?

Thanks again for your comments.

All the best,

Sara

Absolutely I am you okay with the potential for any property owner with a vacant property zoned Two Unit Residential in the Three Mile Plains Growth Centre putting a mobile home on site.

Thank you

Also there was a mobile on the property for 30+ years. wouldn't this fall under the grandfathers clause?

Hi Rose,

The property was purchased as a vacant lot by the property owner in 2019. They have confirmed that the lot was vacant for at least the last 6-8 years. The Land Use

By-law currently permits “mini homes” and “existing manufactured homes” which includes existing mini homes and existing mobile homes in the Two Unit Residential (R-2) Zone. This means that new mini homes are permitted to be placed on site but new mobile homes are not. As this mobile home was newly placed on the Mountain Road property in 2020 it would not be permitted as per the current planning documents. This is the reason the property owner has applied to amend the current planning documents to have Council consider adding “Mobile homes in the Three Mile Plains Growth Centre” to the list of permitted uses in the Two Unit Residential (R-2) Zone.

Please let me know if you have any additional questions.

All the best,

Sara

From Emilie Smith – March 9, 2021

West Hants Regional Municipality
76 Morison Drive
PO Box 3000
Windsor, NS B0N 2T0

To Whom It May Concern;

I am writing to express support of the proposed amendment to the Three Mile Plains growth centre to allow mobile homes as private dwellings. I am a social worker who lives and works in West Hants. Affordable housing has been an ongoing issue faced by families I have worked with throughout my career. Over the past several years this issue has been growing and I have experienced families needing to leave this community because they are unable to find any housing, regardless of affordability. Permitting mobile homes allows for further housing options which are significantly more affordable than new home construction and also timelier in their installation. It is a human right to have shelter. Prohibiting dwellings that are affordable is nothing short of discrimination. In an article written about social inequality regarding mobile home residents, Katherine MacTavish (2007) discusses development in rural areas and that wealth, rather than reputation is becoming measures of character and deciding who does, and thus, who does not, belong. Growth is tightening rural housing markets, particularly in areas that are within a commutable distance to urban centres. Housing ownership is challenging and right now we know that we are in a seller’s market. Home prices are at an all-time high.

Rental properties are basically at a zero vacancy rate and rent prices have surpassed affordability for so many people. Those of us who are fortunate enough to be adequately housed should not be afforded the luxury to make things more difficult for those who are not.

Sincerely,

Emilie Smith MSW, RSW

From Jennifer McCulloch – March 9, 2021

To Whom It May Concern;

I am writing to express support of the proposed amendment to the Three Mile Plains growth centre to allow the use of mobile homes as private dwellings. I live in the Three Mile Plains Growth Centre and work in West Hants. I work for Department of Community Services and affordable housing is an ongoing issue faced by the many families I work with. Throughout my career, spanning several years, the issue of attaining affordable housing has been increasing at an alarming rate and I have first hand experience of families needing to leave this community because they are unable to find any housing, regardless of affordability. When I was younger buying land and placing a mobile home on it to reside in was very common. Families would do this and then save to be able to build a home. This is an important step in homeownership, due to the skyrocketing prices of houses it may be the only way some families will be able to own a home.

Since December of 2019 I have been a member of a housing coalition formed by concerned service providers in Hants County due to the ongoing concerns being recognized in our community through the groups various service roles. The West Hants Housing Coalition is a group of professional community partners who recognize there is a direct need for increased opportunities for individuals in the area to have opportunities to access safe and affordable homes.

Permitting mobile homes to be used, allows for a larger expansion of housing options in the area which can be more affordable than new home construction and be placed for occupancy quickly and efficiently.

It is a basic human right to have shelter. Prohibiting dwellings that are possibly more affordable is nothing short of discrimination to the cohort of society in which would greatly benefit from the amendment to allow mobile homes as private dwellings for the area of Three Mile Plains in the county of West Hants. In an article written about social inequality regarding home residents, Katherine MacTavish (2007) discusses development in rural areas and that wealth, rather than reputation is becoming measures of character and deciding who does, and

thus, who does not, belong. Growth is tightening rural housing markets, again particularly in areas that are within a commutable distance to urban centres. Housing ownership is challenging and right now we know that we are in a seller's market. Home prices are at an all-time high. Rental properties are basically at a zero vacancy rate and rent prices have surpassed affordability for so many people. Those of us who are fortunate enough to be adequately housed should not be afforded the luxury to make things more difficult for those who are not.

Jennifer McCulloch,

Income Assistance and Employment Support Services Caseworker

DCS Windsor

From Kelly McGregor – March 9, 2021

To Whom It May Concern;

I am writing to express support of the proposed amendment to the Three Mile Plains growth centre to allow the use of mobile homes as private dwellings. I am a housing locator for the Annapolis Valley and West Hants is part of my catchment. Affordable housing is an ongoing issue faced by all of the clients I work with. .

Since 2020 I have been a member of concerned service providers in Hants County who of necessity, formed a housing coalition due to the ongoing concerns being recognized in our community through the groups various service roles. The West Hants Housing Coalition is a group of professional community partners who recognize there is a direct need for increased opportunities for individuals in the area to have opportunities to access safe and affordable homes.

Permitting mobile homes to be used, allows for a larger expansion of housing options in the area which can be more affordable than new home construction and be placed for occupancy quickly and efficiently.

It is a basic human right to have shelter. Prohibiting dwellings that are possibly more affordable is nothing short of discrimination to the cohort of society in which would greatly benefit from the amendment to allow mobile homes as private dwellings for the area of Three Mile Plains in the county of West Hants. In an article written about social inequality regarding home residents, Katherine MacTavish (2007) discusses development in rural areas and that wealth, rather than reputation is becoming measures of character and deciding who does, and thus, who does not, belong. Growth is tightening rural housing markets, again particularly in areas that are within a commutable distance to urban centres.

Housing ownership is challenging and right now we know that we are in a seller's market. Home prices are at an all-time high. Rental properties are basically at a zero vacancy rate and rent prices have surpassed affordability for so many people. Those of us who are fortunate enough to be adequately housed should not be afforded the luxury to make things more difficult for those who are not.

Regards,
Kelly McGregor

From Kimm Kent – March 9, 2021

Hi Sara,

I am writing in support of the land use by law amendment permitting mobile homes in Three Mile Plains Growth center. I am writing this as a citizen in West Hants and also in my professional capacity, witnessing the current housing crisis facing citizens of our community.

Thank you.

Peace,

Kimm Kent

Co-Founder / Manager / Facilitator

Peer Outreach Support Services & Education (POSSE) - MetroWorks



Family Resource Centre of West Hants
61 Morison Drive
P.O. Box 2847
Windsor, NS
B0N 2T0
Email: frcowh@gmail.com
Phone: 902-798-5961

March 9th, 2021.

West Hants Regional Municipality
76 Morison Drive
PO Box 3000
Windsor NS B0N 2T0

To Whom It May Concern,

I am writing to express my support of the proposed amendment to the Three Mile Plains Growth Centre to allow the use of mobile homes to be added to the list of permitted uses in the Two Unit Residential (R-2) zone, permitting anyone with a vacant lot in Three Mile Plains that is zoned Two Unit Residential (R-2) to place a mobile home on site.

I am a Housing Support Worker who lives and works in West Hants. The lack of affordable housing in this area is an ongoing issue that majority of my clients are dealing with daily, which is why they need additional support from someone such as myself.

When I took on the role of Housing Support Worker, I also accepted the role of re-launching the West Hants Housing Coalition, a group of professional community partners formed in December 2019, who recognize that there is a need for safe, affordable housing to be more accessible in our area.

In an article published in the Chronicle Herald by Nicole Munro on March 4, 2021, Halifax MP Andy Filmore was interviewed regarding a parking lot in the north end of Halifax being converted into affordable housing units. Filmore speaks about how Halifax much like the rest of the province continues to grow and develop with

an increased population, and notes that affordable housing is struggling to keep up. “Here in Halifax as our city has grown, we’ve seen access to affordable housing struggle to keep pace with the population increase.” (Munro, 2021) He goes on to say, “The situation has become even more dire with the current pandemic. As we’ve sheltered in place to stop the spread of COVID-19, our homes have become a place of safety and refuge, but in a time of crisis the hardest hit are often the most vulnerable.” (Munro, 2021) Those of us that are fortunate enough to be housed, can do our part to help prevent the spread of the global pandemic known as COVID-19. But what about those who are struggling to find housing? Their safety and well-being is just as important.

Mobile homes are a more cost efficient and timelier way to offer housing opportunities to those who need it the most. In a blog post published by Remax Commercial the average cost to build a home in Halifax, Nova Scotia is between \$90-\$150 a square foot. (Remax Commercial, 2020) Given that a mobile home would contain significantly less square footage than a multi level house, the cost to develop these would be considerably less, thus making mobile homes available at a more affordable rate.

According to the results of Canada Mortgage and Housing Corporation’s Rental Market Survey conducted in October 2019, the Halifax CMA vacancy rate was 1% versus 1.6% in October 2018. (CMHC 2020) By increasing the number of affordable housing options in the West Hants Municipality, we can do our part to help increase the vacancy rate in our area and decrease the number of people suffering from or at risk of homelessness.

Sincerely,

Kayla Todd

Housing Support Worker

Family Resource Centre of West Hants

Munro, N. (2021, March 4). *57 Affordable Housing Units To Replace Parking Lot in North-end Halifax*. The Chronicle Herald

<https://www.thechronicleherald.ca/news/local/57-affordable-housing-units-to-replace-parking-lot-in-north-end-halifax-559772/>

Remax Commercial (2020, September 29th). *How Much Does It Cost To Build A Home in Ontario, Canada (2020)?* <https://blog.remax.ca/how-much-does-it-cost-to-build-a-house/>

Canada Mortgage and Housing Corporation (2020). *Rental Market Report – Halifax CMA* <https://assets.cmhc-schl.gc.ca/sites/cmhc/data-research/publications-reports/rental-market-reports/2019/rental-market-reports-halifax-64387-2020-a01-en.pdf?rev=2797a15c-e25b-48a6-b4d1-a26964484bbd>



WEST HANTS REGIONAL MUNICIPALITY REPORT

Information <input type="checkbox"/>	Recommendation <input checked="" type="checkbox"/>	Decision Request <input type="checkbox"/>	Councillor Activity <input type="checkbox"/>
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To: Members of Planning and Heritage Advisory Committee

Submitted by: _____
Sara Poirier, Planner

Date: 2021-03-11

Subject: WHLUB Amendment: 234 Mountain Rd, Three Mile Plains; PID 45213758; File #20-28

LEGISLATIVE AUTHORITY

Section 210 of the Municipal Government Act.

RECOMMENDATION

To allow the requested development, staff recommends that the PAC/HAC forward a positive recommendation by passing the following motion:

that PAC/HAC recommends that Council give First Reading and hold a Public Hearing to consider amending the text of the West Hants Land Use By-law to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone in a manner substantively the same as the draft set out in Attachment A of the report to the Planning and Heritage Advisory Committee report #20-28 dated March 11, 2021.

BACKGROUND

A completed application was received on December 24, 2020 from Jack and Aletha Lantz to consider permitting a mobile home on the lot at 234 Mountain Road, Three Mile Plains (PID 45213758). The lot is owned by Mr. Jack Richard Lantz; Ms. Aletha Lantz is his mother.

The subject lot is zoned Two Unit Residential (R-2) and within the Residential designation and the Three Mile Plains Growth Centre. The lot is approximately 15,000 sq. ft. (0.34 acres) in size. A survey plan of the lot from 1988 shows that a mobile home was located

on the lot. The owner purchased the then-vacant lot in October 2019. Mr. Lantz stated that he believes the lot has been vacant for at least the last 6-8 years.

A mobile home was placed on the lot in November 2020 without first receiving development and occupancy permits. Only single and two-unit dwellings, mini homes, accessory apartments and existing manufactured homes are permitted in the Two Unit Residential (R-2) zone, as per the West Hants Land Use By-law. Therefore, the Development Officer could not issue a permit for the mobile home that was placed on site and the resident was advised to apply to have Council consider the addition of mobile homes to the list of permitted uses in the Two Unit Residential (R-2) zone in Three Mile Plains.

DISCUSSION

The subject lot is located on Mountain Road in Three Mile Plains. The lot is designated Residential on the Generalized Future Land Use Map (Figure 1) of the West Hants Municipal Planning Strategy (WHMPS) and is within the Three Mile Plains Growth Centre. Part 5.3 of the WHMPS contains the overall intention for properties designated Residential within the Three Mile Plains Growth Centre in West Hants.

The lot is zoned Two Unit Residential (R-2) on the Zoning Map of the West Hants Land Use By-law (WHLUB) (Figure 2). As noted above only single and two-unit dwellings, mini homes, accessory apartments and existing manufactured homes are permitted in the Two Unit Residential (R-2) zone. The lot abuts properties zoned Two Unit Residential (R-2) and designated Residential within the Three Mile Plains Growth Centre.

The applicant requested that Council consider amending the text of the West Hants Land Use By-law (WHLUB) to permit "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone. If the application is approved, any vacant lot within the Three Mile Plains Growth Centre would be permitted to place a mobile home on the lot (Figure 3), subject to receiving the required development and building permits.

Mobile Homes

A mobile home is a type of manufactured home incorporating a bow-truss roof and designed for transportation on its own frame. Table 1 outlines the definitions for mobile homes, mini homes and manufactured home as per the current West Hants Land Use By-law and as per the list of definitions accepted by the Planning Advisory Committee on September 10, 2020 for incorporation in the Regional planning documents.

The Manager of Building and Fire Inspection Services has confirmed that there is no difference in terms of building or fire codes between mobile homes and mini homes as per the National Building Code of Canada and added that mobile homes are just an older style factory built home.

Table 1: Definition of Mobile Home, Mini Home and Manufactured Home

Term	Description
<p>Mobile Home</p>	<p><i>means a manufactured home incorporating a bow-truss roof and designed for transportation on its own frame;</i> (Definition from the West Hants Land Use By-law and approved for incorporation in the Regional documents)</p> <p>Identifiers:</p> <ul style="list-style-type: none"> • bow-truss roof • designed for transportation on its own frame <div style="display: flex; justify-content: space-around;"> <div data-bbox="493 604 899 909">  </div> <div data-bbox="927 604 1403 909">  </div> </div> <p>Website: https://toughnickel.com/real-estate/Tips-on-Buying-and-Older-Mobile-Home</p> <p>Mobile home placed on site at 234 Mountain Rd., Three Mile Plains</p>
<p>Mini Home</p>	<p><i>means a manufactured home incorporating a pitched roof;</i> (Definition from the West Hants Land Use By-law)</p> <p><i>means a dwelling unit built as a manufactured home to a CSA standard which meets or exceeds a length to width ratio of 3:1 and incorporates pitched roof;</i> (Definition approved for incorporation in the Regional documents)</p> <p>Identifiers:</p> <ul style="list-style-type: none"> • meets or exceeds a length to width ratio of 3:1 • incorporates pitched roof <div style="display: flex; justify-content: space-around;"> <div data-bbox="459 1543 852 1759">  </div> <div data-bbox="899 1543 1403 1766">  </div> </div> <p>Website: http://www.havillsminihomes.com</p> <p>Website: https://heatherhomes.co/new-3-bdrm-mini-homes/</p>

Manufactured Home	<p><i>means a dwelling unit manufactured in a factory and designed for transportation after fabrication, whether on its own wheels or a trailer, which arrives at the site where it is to be occupied as a dwelling complete and ready for occupancy (except for minor unpacking and assembling operations to place the building on an acceptable foundation), and having a width of not more than 6 m (20 ft), but does not include a travel trailer or recreational vehicle. Manufactured home includes a mobile home and a mini home, but does not include a modular or sectional home transported in two or more sections and assembled on site;</i></p> <p>(Definition from the West Hants Land Use By-law and approved for incorporation in the Regional documents)</p>
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DOCUMENT REVIEW

The Province of Nova Scotia has six (6) *Statements of Provincial Interests* which form part of the *Municipal Government Act* and provide municipalities guidance on certain aspects of development in the Province: drinking water, flood risk areas, agricultural land, infrastructure, housing and the development of the Nova Centre. The *Statement of Provincial Interest* related to housing specifies that the goal is to “provide housing opportunities to meet the needs of all Nova Scotians” by incorporating housing policies into the municipal planning documents which address affordable housing, special-needs housing, rental accommodation, and providing for manufactured housing. All of the planning documents for the Region have housing policies and discuss residential development in specific communities. Staff reviewed the planning documents for Hantsport, West Hants and Windsor to determine where mobile homes are permitted in the Region (Table 2).

Table 2: Zones where Mobile Homes are Permitted in the Regional Municipality

Hantsport	West Hants	Windsor
<p>Mini Home Park Zone permits “Mini homes”; this zone is not used anywhere in Hantsport.</p>	<p>Single Unit Residential (R-1) Zone permits “Existing manufactured homes”</p> <p>Two Unit Residential (R-2) Zone permits “Mini homes” but not mobile or manufactured homes; and permits “Uses permitted in the R-1 zone subject to the R-1 zone requirements”</p> <p>Rural Residential (R-4), Manufactured Home Park (MHP), Agricultural Priority Two (AR-2), General Resource (GR)</p>	<p>No discussion on mobile or mini homes in Windsor.</p>

	<p>and Mineral Resource (MR) Zones permit "Manufactured homes"</p> <p>General Commercial (GC) Zone permits "Single unit dwellings or mini homes on existing vacant lots under 10,000 ft² in area, subject to the R-1 zone requirements"</p> <p>Agricultural Priority Three (AR-3) Zone permits "Manufactured homes" however "21.3 (b) mobile homes shall not be permitted on properties zoned AR-3 in a Growth Centre or Village designation."</p> <p>Resource Industrial (M-1) and Hamlet Industrial (M-2) Zones permit "One dwelling unit in conjunction with a permitted industrial use, either located in the same building or as a single unit dwelling or manufactured home on the same lot"</p>	
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West Hants Municipal Planning Strategy

As the application to permit a mobile home came from a resident in Three Mile Plains, staff concentrated on the housing policies in the West Hants Municipal Planning Strategy for guidance and direction.

An excerpt from Section 4.11, *Housing*, of the West Hants Municipal Planning Strategy outlines Councils intention for housing in West Hants by stating "Council feels it is important to encourage the provision of housing that is inclusive of all citizens of West Hants regardless of socio-economic status, age or physical or mental disability". Policy 4.11.1 outlines that Council will "encourage the provision of housing adequate to meet the needs of all citizens of West Hants. Affordable housing, special-needs housing and rental accommodation shall be encouraged to develop in a manner that is sensitive to the needs of the community and those being served" and Policy 4.11.2 states that Council shall "provide for the development of a range of housing types in West Hants".

Manufactured Home Parks

Section 4.15 of the West Hants Municipal Planning Strategy General Land Use Policies describes the policies for the creation of manufactured home parks where “residents may own, lease or rent their homes, but do not own the land”. Policy 4.15.1 specifies that a Manufactured Home Park (MHP) Zone will be created and applied to existing manufactured home parks, and Policy 4.15.2 specifies that new manufactured home parks will be considered by development agreement only in the Growth Centres.

The specific sections for the Falmouth and Three Mile Plains Growth Centres also outline a corresponding policy which allows manufactured home parks to be considered by development agreement (Policy 5.3.9 and 5.4.6). To determine if stand alone mobile homes are permitted in specific areas of the municipality the specific policies for each community were reviewed.

Falmouth

Some of the general development objectives of the Falmouth Growth Centre are to provide for predominantly residential development, accommodate rural lifestyle activities that are compatible with moderate density residential development, and to monitor the extension of services to ensure the capacity of the municipal sewer and water system is not exceeded. Section 5.4 of the West Hants Municipal Planning Strategy discusses the residential policies for the Falmouth Growth Centre. Policy 5.4.7 specifically states that *“It shall be the policy of Council to prohibit the development of mobile homes on separate lots which are not part of a manufactured home park in the Falmouth Growth Centre.”*

Staff are not recommending any changes that would permit mobile homes on individual lots in the Falmouth Growth Centre.

Brooklyn

The general development objectives for the community of Brooklyn are to maintain the quiet, village atmosphere and continue its role as a commercial and institutional service centre for surrounding communities. Section 6.2 of the West Hants Municipal Planning Strategy discusses the residential policies for the community of Brooklyn, currently referred to as a Village in the planning documents. Policy 6.2.2 specifically states that *“It shall be the policy of Council to apply Two Unit Residential (R-2) zoning to the majority of residential land outside the Village Core area of Brooklyn. Within the Village designation, the R-2 zone will permit one and two unit dwellings and mini homes; however, mobile homes will not be permitted.”*

Staff are not recommending any changes that would permit mobile homes on individual lots in the community of Brooklyn.

Three Mile Plains

Some of the general development objectives of the Three Mile Plains Growth Centre are to accommodate the majority of future commercial growth in West Hants, permit an urban residential growth pattern which includes higher density development, and allow the development of small lots to make better use of existing infrastructure. Section 5.3 of the West Hants Municipal Planning Strategy discusses residential policies for the Three Mile Plains Growth Centre. The background statement for the residential policies in the Three Mile Plains Growth Centre states *“The majority of residential land in the Three Mile Plains Growth Centre will be zoned Two Unit Residential (R-2) which permits one and two unit dwellings and mini homes. Mobile homes will not be permitted except in manufactured home parks which will be considered by development agreement”*. Unlike the sections of the West Hants Municipal Planning Strategy for Falmouth and Brooklyn,

there is no policy that corresponds with this background statement to prohibit stand alone mobile homes in Three Mile Plains. Therefore, staff are requesting Council consider the request to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) Zone.

Two Unit Residential (R-2) Zone

Staff investigated where else in West Hants the Two Unit Residential (R-2) zone is permitted. The Two Unit Residential (R-2) zone is one of the residential zones in the communities of Three Mile Plains, Brooklyn, Currys Corner, Garlands Crossing and Falmouth (Figure 3). The Three Mile Plains Growth Centre incorporates the land zoned Two Unit Residential (R-2) in the communities of Currys Corner, Garlands Crossing and Three Mile Plains (Figure 4).

As the amendment to the list of permitted uses in the Two Unit Residential (R-2) zone would be written specifically as "Mobile homes in the Three Mile Plains Growth Centre", this use would not be permitted on any other lot zoned Two Unit Residential (R-2) outside of the Three Mile Plains Growth Centre. This amendment would be consistent with the policies described earlier.

WHMPS Specific Criteria

There are no specific criteria for this text amendment.

WHMPS General Criteria

The proposed amendment will meet the general criteria for amendments and development agreements set out in WHMPS Policy 16.3.1. These criteria are examined in detail in Attachment B. In summary:

- the proposal is not premature or inappropriate for the area;
- no municipal costs related to the proposal are anticipated;
- the Fire Chief, Development Officer, Manager of Building and Fire Inspection Services, Director of Public Works, Manager of Public Works Operations, and Area Manager for the Department of Transportation and Infrastructure Renewal have no concerns.

West Hants Land Use By-law

Section 5.23 of the West Hants Land Use By-law states that "where manufactured homes are permitted by this By-law, the following conditions shall be met:

- (a) No wheels, hitches or other transport attachments shall be visible; and
- (b) The structure shall be skirted within 30 days of placement on the lot."

The applicants would be required to follow these regulations if this application is approved.

Text Amendment

To permit the requested use, an amendment to the text of the West Hants Land Use By-law (WHLUB) would be required. The proposed amendment is to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone (Attachment A).

Map Amendment

As the subject lot is currently zoned Two Unit Residential (R-2), a map amendment is not required as part of this application.

MUNICIPAL CLIMATE CHANGE ACTION PLAN

The Municipal Climate Change Action Plan (MCCAP) for West Hants (2013) identifies that overtopping of the Lebreau Creek Brook has caused flooding of homes adjacent to the brook along Highway 1, near Panuke Road, and in Three Mile Plains. Map 2B shows that some properties along Highway 14 and the Windsor Back Road may experience flooding in the future due to sea level rise, and Appendix B, the Inland Flooding Map, shows some areas in Three Mile Plains that may face inland flooding in the future.

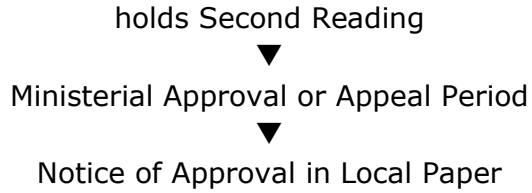
The Three Mile Plains Stormwater Management Study (2019) completed a series of simulations to identify areas that may be potentially vulnerable to flooding. Specific Lebreau Creek Brook crossings at Old Shanks Road, Mountain Road and Panuke Road in Three Mile Plains were identified as areas that may be vulnerable to flooding. Other flood vulnerable areas in Three Mile Plains include: Alexander Drive, Denise Drive, Windsor Back Road, Highway 1, and Three Mile Plains Cross Road.

As this is a general text amendment and not a map amendment for a specific lot, any property owner within the Three Mile Plains Growth Centre should review the MCCAP and Three Mile Plains Stormwater Management Study to be aware of any potential flood risk to their lot prior to developing.

NEXT STEPS

As noted above, the proposed amendment has been considered within the context of the general policies of the WHMPS and is consistent with the intent, objectives and policies of the WHMPS. The amendment meets the general criteria for amendment to the WHLUB. As a result, it is reasonable to amend the text of the West Hants Land Use By-law to add "Mobile homes in the Three Mile Plains Growth Centre" to the list of permitted uses in the Two Unit Residential (R-2) zone.





FINANCIAL IMPLICATIONS

There are no anticipated costs to the Municipality in regard to this development.

ALTERNATIVES

In response to the application, PAC may recommend that Council:

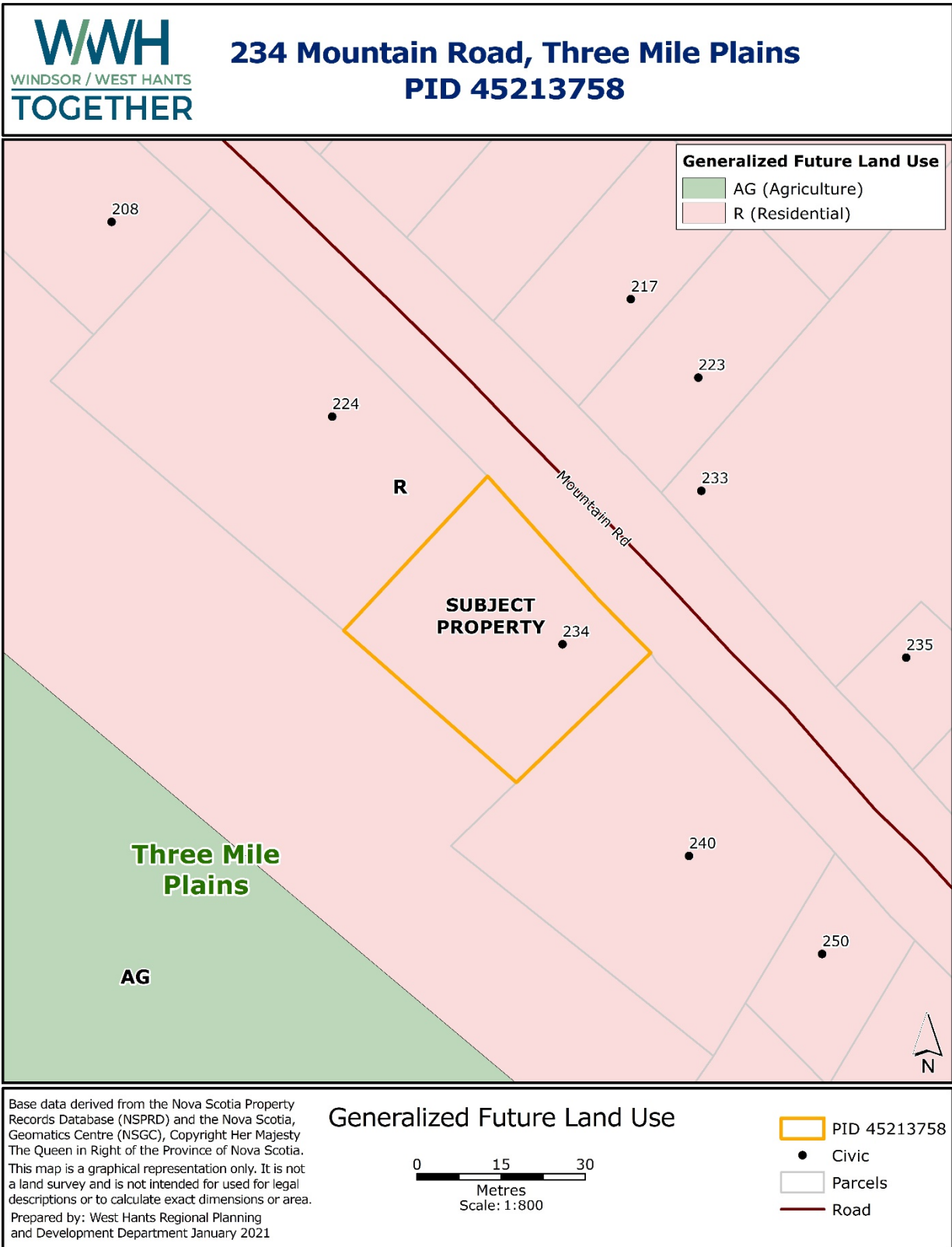
- recommend that Council hold First Reading and authorize a Public Hearing to approve the WHLUB amendment as drafted or as specifically revised by direction of PAC;
- provide alternative direction such as requesting further information on a specific topic.

ATTACHMENTS

Figure 1	West Hants GFLUM Extract
Figure 2	West Hants Zoning Map Extract
Figure 3	West Hants Zoning Map Extract - Two Unit Residential (R-2) Zone
Figure 4	West Hants Zoning Map Extract - Two Unit Residential (R-2) Zone within the Three Mile Plains Growth Centre
Attachment A	Draft Amendments to the West Hants Land Use By-law
Attachment B	General Criteria for Amendment

Report Reviewed by: _____
Madelyn LeMay, Director of Planning and Development

**Figure 1
West Hants GFLUM Extract**



**Figure 2
West Hants Zoning Map Extract**

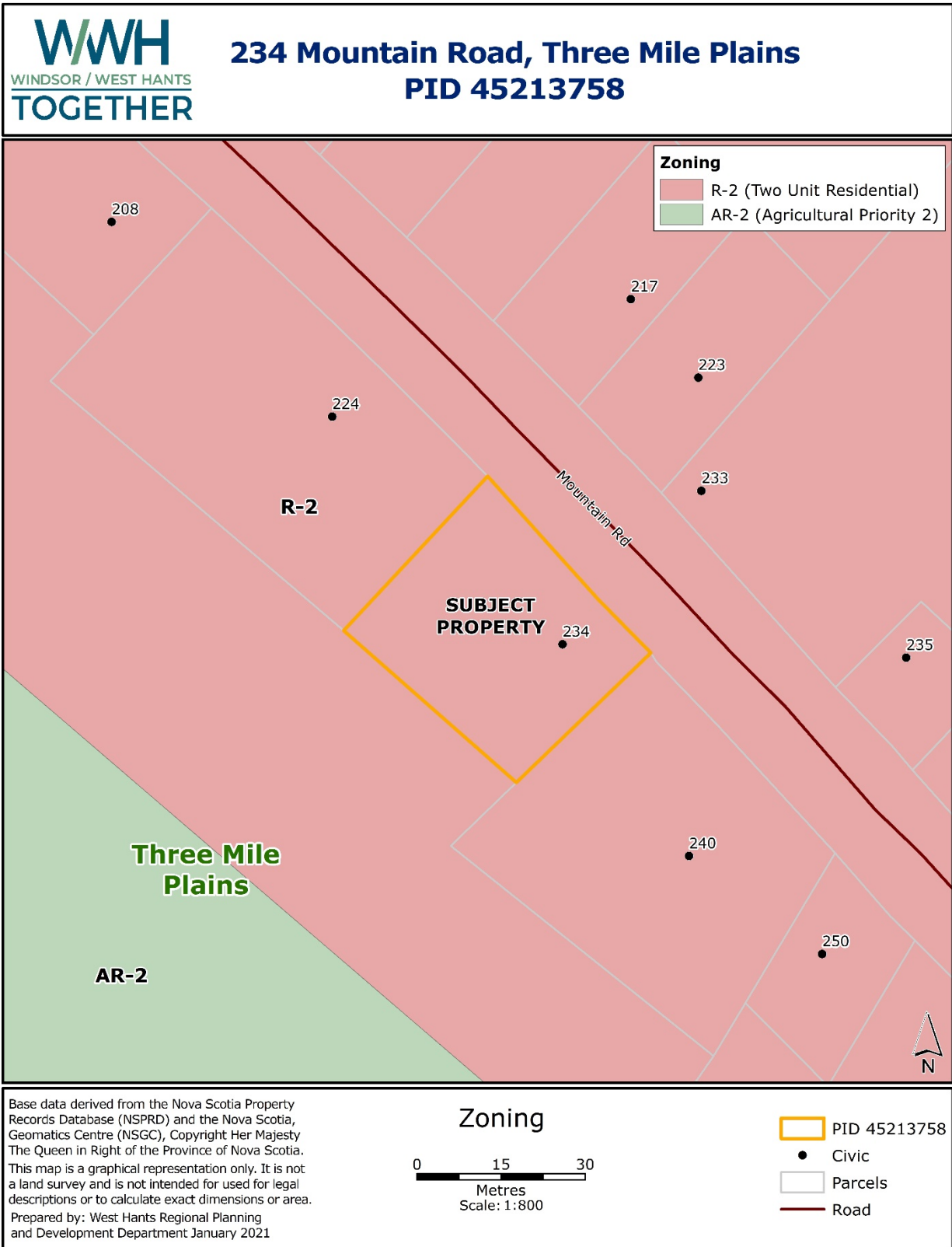


Figure 3
West Hants Zoning Map Extract
Two Unit Residential (R-2) Zone

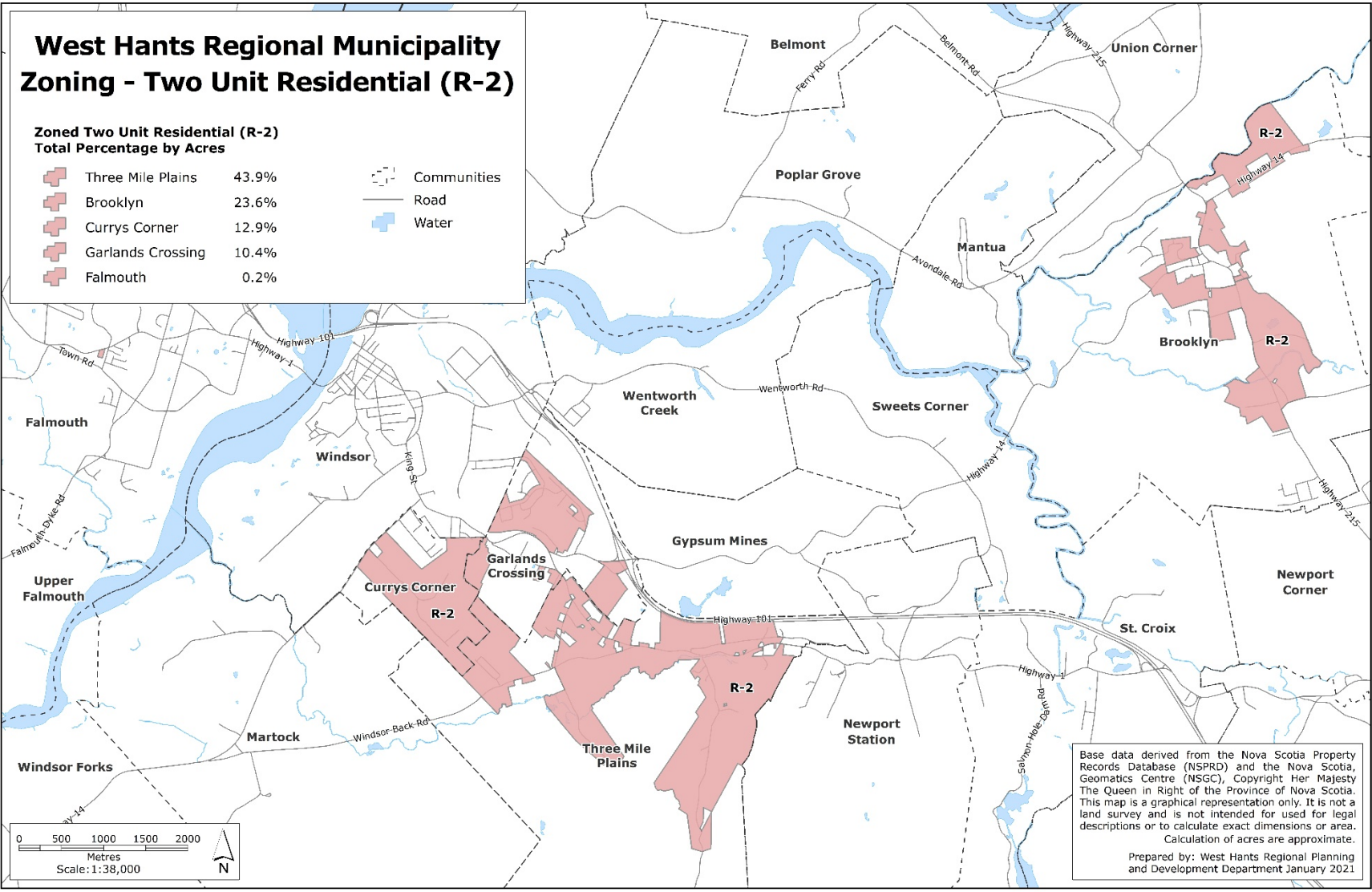
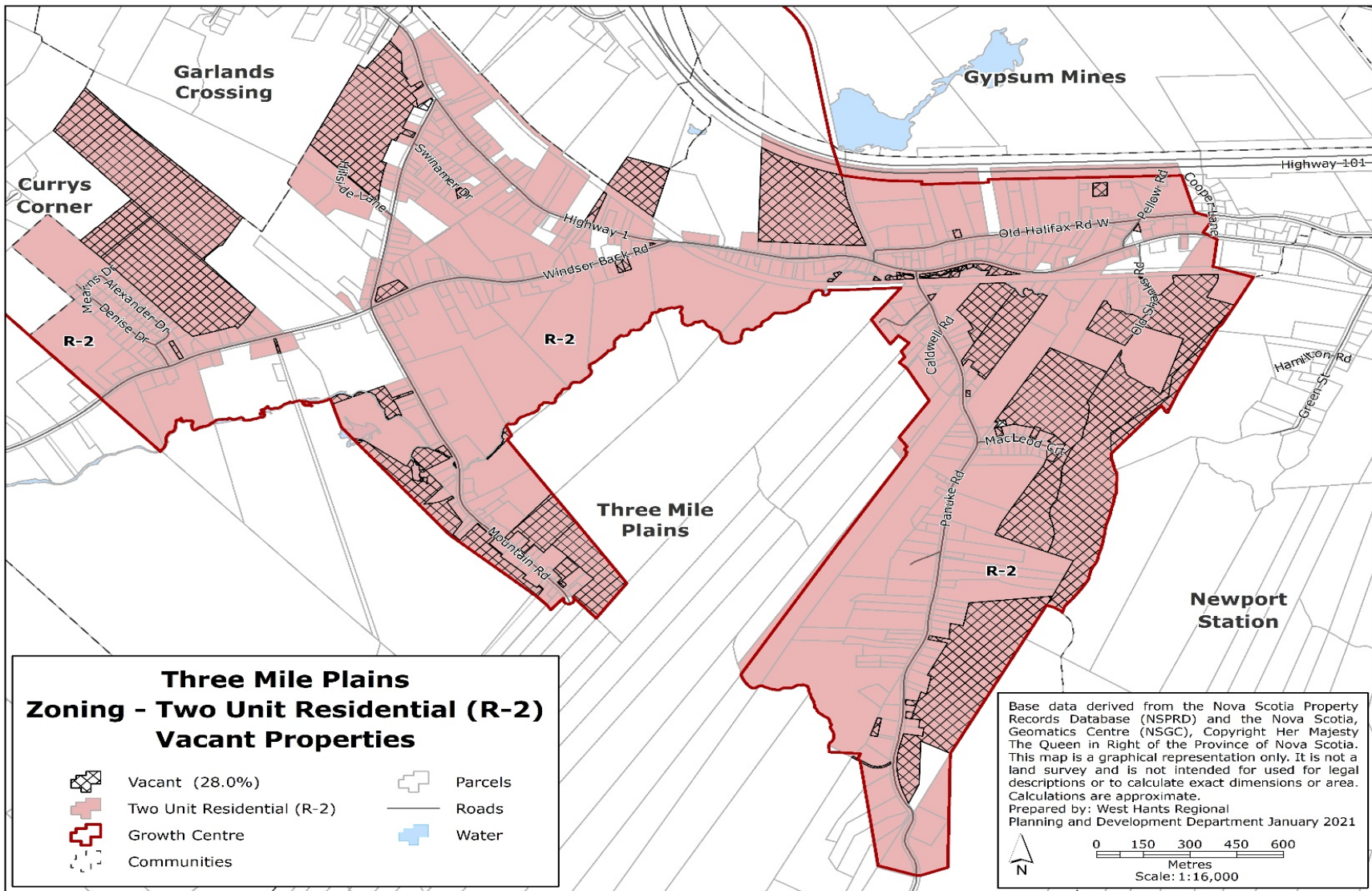


Figure 4
West Hants Zoning Map Extract
Two Unit Residential (R-2) within the Three Mile Plains Growth Centre



Attachment A
Draft Amendments to the West Hants Land Use By-law

A text amendment to the list of permitted uses in the Two Unit Residential (R-2) Zone in the West Hants Land Use By-law to permit mobile homes in the Three Mile Plains Growth Centre.

In Part 9.0 of the West Hants Land Use By-law, *Two Unit Residential (R-2)*:

- 1. Amend Part 9.1 *Permitted Uses* to include mobile homes in the Three Mile Plains Growth Centre to the list of permitted uses by adding “Mobile homes in the Three Mile Plains Growth Centre” to the list of permitted uses; and**
- 2. Amend the lot specification chart in Part 9.2 to require the same lot specifications for mobile homes as mini homes by adding “Mobile homes”, so that it reads as follows:**

9.0 TWO UNIT RESIDENTIAL (R-2)

Permitted Uses

9.1 The following uses shall be permitted in the Two Unit Residential (R-2) zone:

- Two-unit dwellings
- Mini homes
- Uses permitted in the R-1 zone subject to the R-1 zone requirements
- Mobile homes in the Three Mile Plains Growth Centre

9.2 In the R-2 zone, no development permit shall be issued except in conformity with the following:

	Mobile homes and Mini homes		Two-unit dwellings	
	with municipal services	with on-site services	with municipal services	with on-site services
Minimum lot area	6,000 ft ² (557.40 m ²); 7,000 ft ² (650.30 m ²) for corner lots	29,000 ft ² (2,694.10 m ²)	3,500 ft ² (325.15 m ²)/unit	29,000 ft ² (2,694.10 m ²)/unit
Minimum lot frontage	50 ft (15.24 m)	100 ft (30.48 m)	30 ft (9.14 m) / unit	100 ft (30.48 m) / unit
Minimum front yard	15 ft (7.62 m)			

Minimum rear yard		25 ft (7.62 m)
Minimum side yard	one side	6 ft (1.83 m)
	other side	6 ft (3.05 m)
Max. height of main building		35 ft (10.67 m)

(Amendment GC2LUB 17-01 Effective March 7, 2018)

Subdivision of Semi-detached Units

- 9.3 Semi-detached dwelling units located on an approved water and sewer serviced lot may be subdivided into lots provided each dwelling unit has separate service connections and provided all applicable provisions of the West Hants Subdivision By-law and this By-law are met. No side yard shall be required along the common lot boundary dividing a semi-detached dwelling.

Attachment B
General Criteria for Amendment

Policy 16.3.1 In considering development agreements and amendments to the West Hants Land Use By-law, in addition to the criteria set out in various policies of this Strategy, Council shall consider:

CRITERIA	COMMENT
<i>(a) whether the proposal is considered premature or inappropriate in terms of:</i>	
<i>(i) the adequacy of sewer and water services;</i>	The Director of Public Works has stated that adding mobile homes in the Three Mile Plains Growth Centre to the list of permitted uses in the Two Unit Residential (R-2) zone would have no negative impact related to the adequacy of municipal services in these serviced areas. They also noted that some of the areas shown on the map (Figure 3) may not have access to municipal water / wastewater services.
<i>(ii) the adequacy of school facilities;</i>	No impact on school facilities is anticipated.
<i>(iii) the adequacy of fire protection and other emergency services;</i>	In response to an inquiry, the local Fire Chief stated "I do not have any fire resource or hazard concerns with these structures being permitted in the county. There are many of these that are older models and we do definitely adjust our approach to them, but none that would refuse them being allowed in bylaws." The Manager of Building and Fire Inspection Services stated that "under the Building & Fire Codes, there is no difference between Mini Homes & Mobile Homes. Mobile Homes are just an older style factory built home". They have no issues with this change with regard to fire safety.
<i>(iv) the adequacy of road networks adjacent to, or leading to the development; and</i>	The Area Manager for the Department of Transportation and Infrastructure Renewal stated that "the Department does not anticipate an impact to the adequacy of the Provincial road network with the proposed changes to the West Hants Land Use By-law." The Manager of Public Works Operations stated they would not anticipate any

	<p>impact or have any concerns related to transportation of the mobile homes on the West Hants Regional Municipality road network by permitting mobile homes in the Two Unit Residential (R-2) zone of the West Hants Land Use By-law.</p>
<p><i>(v) the financial capacity of the Municipality to absorb any costs relating to the development.</i></p>	<p>There are no anticipated costs to the Municipality related to this development agreement amendment.</p>
<p><i>(b) whether the development is serviced, or capable of being serviced, by a potable water supply and either central sewer or an approved on-site sewage disposal system;</i></p>	<p>The Director of Public Works noted that some areas on the map (Figure 3) may not have access to municipal water / wastewater services. This would be assessed as permits are requested for specific properties.</p>
<p><i>(c) the suitability with any aspect relative to the movement of auto, rail and pedestrian traffic;</i></p>	<p>The Area Manager for the Department of Transportation and Infrastructure Renewal stated that "the Department has no transportation concerns with respect to permitting mobile homes in the Two Unit Residential (R-2) zone."</p> <p>The Manager of Public Works Operations stated they would not anticipate any impact or have any concerns related to transportation of the mobile homes on the West Hants Regional Municipality road network by permitting mobile homes in the Two Unit Residential (R-2) zone of the West Hants Land Use By-law.</p> <p>There are no anticipated impacts to rail or pedestrian traffic by permitting mobile homes in the Three Mile Plains Growth Centre.</p>
<p><i>(d) the adequacy of the dimensions and shape of the lot for the intended use;</i></p>	<p>The dimensions and shape of the lot for a mobile home would have to meet the Two Unit Residential (R-2) zone requirements. This would be assessed as permits are requested for specific properties.</p>
<p><i>(e) the pattern of development which the proposal might create;</i></p>	<p>One of the Development Officer stated that they do not have any issues or concerns allowing mobile homes in the Two Unit Residential (R-2) zone as they may provide a more affordable housing option for residents. However, they did note that mobile homes are encouraged in Mobile Home Parks by Development Agreement and are not encouraged in</p>

	<p>Falmouth and Brooklyn as per policy based on public input. They stated that if mobile homes were permitted in Falmouth and Brooklyn the general public may be opposed. The proposed amendments to the documents would only allow mobile homes on properties zoned Two Unit Residential (R-2) in the Three Mile Plains Growth Centre. The other Development Officer added that "Mobile homes provide an affordable housing option. Mobile homes are sometimes a first step in an effort to find affordable housing and quite often leads to a future investment in a mini home, single unit dwelling, etc. Although they may not be appropriate in all R2 zones, I do not have a problem in permitting them in the R2 zones in the Three Mile Plains Growth Centre as the area is already the location for many mobile homes. As the availability of mobile homes due to decreasing production over time will become a factor and with the increase in popularity of mini homes, it can be expected the number of mobile homes will greatly be reduced. Allowing mobile homes in the R2 zones of the Three Mile Plains Growth Centre I don't believe would create a pattern of development negatively affecting other areas."</p>
<p><i>(f) the suitability of the area in terms of steepness of grade, soil and geological conditions, location of water courses or wetlands, and susceptibility of flooding;</i></p>	<p>The suitability of the area in terms of steepness of grade, soil and geological conditions, location of water courses or wetlands, and susceptibility of flooding would have to be assessed as permits are requested for specific properties. The lot for a mobile home would have to meet the Two Unit Residential (R-2) zone requirements. This would be assessed as permits are requested for specific properties.</p>
<p><i>(g) whether the proposal meets the requirements of the appropriate provincial or federal agencies as well as whether it conforms to all other relevant municipal by laws and regulations; and</i></p>	<p>All Municipal, Provincial and Federal regulations will have to be met.</p>

<i>(h) any other matter required by relevant policies of this Strategy.</i>	All other matters have been addressed elsewhere in this report.
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