

April 17, 2020

Submission to the “Residential Flexibility in the ALR Intentions Paper”

Submitted by email at ALR_ALCRevitalization@gov.bc.ca

About CHBA BC

Canadian Home Builders' Association of BC (CHBA BC) is a provincial association made up of 2,200 members affiliated with one of eight local associations in B.C. These member companies in the residential construction industry are home builders, renovators, tradespeople, suppliers, service professionals, and others. Overall, the residential construction industry represents over 207,184 on-site and off-site jobs, \$12.6 billion in wages, and \$28.3 billion in investment value.

Overview

As there are many points raised in the consultation paper, we have kept our comments specific to the areas impacting residential construction and of particular concern to our membership. Please contact us for further discussion if there are any specific areas where the ministry requires additional feedback from our industry.

Ultimately, the framework and policies must be clearly outlined in order to support residential flexibility. Having further clarity on permitted residences, as identified in the technical suggestions below, will enable home builders and renovators to better advise their clients on appropriate home modifications that address aging in place and family needs. This is even more important in areas of the province with higher percentages of ALR land within its boundaries.

Overall, we support the intention of this paper to provide flexibility for legitimate residential uses in the ALR to support B.C.'s farmers and their families.

Public Consultation

As per the public consultation, many participants expressed a desire to allow a small second residence for all ALR land owners without the ALC approval - CHBA BC would agree with this sentiment. There are many legitimate reasons in the policy paper for a second residence. The policy direction to require approval from the local government is also sufficient in this case.

Participant landowners also felt uncertain whether they could replace a structure if destroyed or in disrepair. CHBA BC would support the policy suggestion to make it easier for replacements and repair for residential properties in the ALR. The need is inevitable to replace or renovate structures over the longer term.

Technical Suggestions

In review of the technical specifications we offer the following comments. Given many of the final specifications are unknown, we would be happy to participate in future discussions in this area.

Review of the 9m limit: We believe that the modular home width should be extended to 9.2m so that 30ft modular homes fit within the requirements. While this is a minor increase, anything over the

current 29.53ft would be disallowed by the local government. This provides slightly more options with limited impact to the ALR objectives.

Suites: The current rules should be clear for suites. For example, can a homeowner have a carriage house/secondary home as well as a suite inside the home? Could that suite be underground or at grade? We would suggest the more flexibility with suites is preferred to increase the homeowners' design options and meet multiple needs. This would also be consistent with the BC Building Code 2018 Revision 2, where secondary suites may have more than one story, be on the same level as the other dwelling unit, or be above or below it.

Size limits: While we respect that size limits may be imposed for the total of all dwelling units, it is unclear why a secondary modular home could be built up to 2250 sq ft. but a secondary carriage house would be limited to 968.75 sq. ft. In addition, we recommend maintaining consistency with the BC Building Code: the 2018 Edition, Revision 2 has removed the total floor space limitation of 90 m² for secondary suites.

Follow Up

Thank you for the opportunity to participate in this consultation. We recognize this is an ongoing conversation and would be pleased to participate in any additional consultations or discussions on this topic.