

January 13, 2022

Dan Coulter, Parliamentary Secretary for Accessibility

Submitted by email to BSSB.public.review@gov.bc.ca

Re: Public Engagement on BC Building Code Accessibility

CHBA BC is the leading advocate for the residential construction industry, representing 2,200 member firms through our eight (8) locally affiliated home building associations. Our members are small- and medium-sized businesses who are builders, renovators, tradespeople, service professionals, and more.

In 2020, our sector contributed over 183,000 on-site and off-site jobs in new home construction, renovation, and repair in B.C. This created \$12 billion in wages and \$22.6 billion in built investment value.

Discussion

CHBA BC recognizes the need for improving accessibility in new buildings, specifically as it applies to facilities and services open or provided to the public. Our association has been actively engaged with the Attorney General and Minister Responsible for Housing and the Building and Safety Standards Branch regarding new residential construction and supports the Province's continued efforts to collaborate with industry while maintaining housing affordability.

We understand that the online survey to provide feedback is intended to be broad, and have put forward some items for consideration below.

Scope and Application of Accessibility Requirements

The Building Code already requires residential multi-unit buildings to have a minimum level of accessibility that apply to the individual units as well as to building entrances, corridors and common areas. CHBA BC supports this approach to adaptable dwelling units that provides consistency in how adaptable housing is designed and built, while giving local governments the flexibility to decide whether they want to require it. Should future requirements be considered to apply to Part 9 dwelling units, special consideration is warranted.

Meeting Individual Needs

Home modifications for accessibility require assessments tailored to the occupant's specific conditions and design needs, which may include the progression of that condition so that the modifications continue to serve their purpose. A "one-size-fits-all" approach to accessibility may be problematic, particularly in Part 9 dwellings.

Careful consideration of broad accessibility requirements is needed to avoid conflicts between the specific needs of different disabilities. For example, smoke alarms with visual signalling for the hearing impaired can trigger seizures with people with photosensitive epilepsy. The same prescriptive accessibility requirements may not be ideal to apply across all building types.

Coordination of Provincial Priorities

Accessibility requirements in the BC Building Code should not conflict with other provincial priorities, such as climate adaptation and mitigation. For example, an accessible route from the sidewalk to street level to the entrance door of a house may create challenges with climate adaptation requirements for flood-resilience, which require elevated floors. The Province should consider a similar approach taken by the National Building Code development process, in establishing cross-committee coordination to review proposed changes for potential conflicts and unintended consequences.

Housing Affordability

Housing affordability should be an overarching principle in Building Code development and addressing accessibility in new homes. Industry consultation will be critical to inform the cost-benefit analysis of proposed requirements. For instance, stakeholder feedback on the City of Vancouver's "enhanced accessibility" requirements expressed concern that wider stairways would create a substantial burden in laneway homes, which have limited headroom (and floor area.) As such, city staff did not recommend an increase the width of stairs in laneway houses. When assessing potential accessibility requirements under an affordability lens, it may be beneficial to limit changes to non-structural features or adaptable housing design, which allow features to be added more easily and inexpensively after construction. Consideration must also be given to industry capacity, product availability, enforcement implications, and life cycle costs that will impact British Columbians and reduce housing affordability.

Closing Remarks

Thank you for the opportunity to be involved in this process and for considering our comments. We look forward to providing feedback to help inform proposed changes to the next BC Building Code. If you have questions, or would like to have a follow up discussion, please contact the undersigned.

Regards,



Pauline Rupp
Director, Technical and Building Innovation