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Submission to the [British Columbia Framework for Accessibility Legislation](#)

Ministry of Social Development and Poverty Reduction

Submitted by email to engageaccessibility@gov.bc.ca

About Canadian Home Builders' Association of BC (CHBA BC)

CHBA BC represents over 2,200 member companies in the residential construction industry who work as home builders, renovators, tradespeople, suppliers, service professionals, and others. CHBA BC members are small and medium-sized businesses creating jobs and economic benefits in all areas of the province. 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

The purpose of this Framework for Accessibility Legislation is to begin a conversation about accessibility legislation for B.C. Currently, B.C. does not have comprehensive legislation to help identify, remove, and prevent barriers experienced by persons with disabilities.

The document outlines ideas about what accessibility legislation in B.C. could look like. However, these ideas are not finalized. There are several accompanying questions brought up that call for stakeholder input and feedback to help guide the subsequent development of B.C.'s accessibility legislation. The following information reflects the perspective of the Canadian Home Builders' Association of B.C., based on the information available in the consultation document.

Discussion

Accessibility Principles

The Canadian Home Builders' Association (CHBA) supports the participation of all individuals in society. CHBA recognizes that society does not always accommodate every individual's needs, and that this can limit their participation in society. CHBA supports accessibility and visitability as it applies to facilities and services open or provided to the public.

Conversely, CHBA recognizes that Canadians view their homes as a private space—a space they expect to tailor to their individual needs, wants and budgets—and hence affordability should be considered when determining appropriate regulations.

Accessibility Standards - Built Environment

When considering the approach to developing accessibility standards, it is critical to coordinate with other Ministries, such as the Ministry of Environment and Climate Change Strategy and the Ministry of Municipal Affairs and Housing, to ensure there are no conflicting policies. Specifically, developing accessibility standards for the built environment should take into account the targets set out by the

CleanBC plan, which affects all new buildings and upgrades to existing buildings in B.C. For example, a no-step entry may conflict with climate adaptation requirements for flood-resilience.

The Province of British Columbia has already committed to making buildings more accessible for persons with disabilities through the BC Building Code (BCBC). By combining the requirements of the 2015 National Building Code with the historical requirements of the BCBC, a higher level of building accessibility has been established in the 2018 edition of BCBC.

CHBA BC supports the code development process for proposed changes, whereby there is a public review, stakeholder consultation and cost-benefit analysis. However, the accelerated pace of change in the BC Building Code should not impair housing affordability and impact British Columbians' ability to access homeownership. For example, wider hallways and doors greatly increase floor space, which not only add to costs in construction but may restrict housing options on narrow lots. CHBA BC strongly believes that affordability and evidence-based decisions must be a key objective when code changes are considered.

There are significant risks to “moving too quickly” for mandatory changes, including costs, industry capacity and competency/training. Voluntary approaches can ensure proper evaluation takes place and helps to mitigate unintended consequences that may be overlooked if codes require measures before the industry is ready.

Encouraging Voluntary Efforts

CHBA actively supports our members' voluntary efforts to improve the accessibility and visitability of both new and existing homes, providing them as voluntary options to their customers. For instance, CHBA established a Home Modification Council that supports many aspects of aging in place for Canada's seniors and for persons with disabilities and their caregivers. We recognize that the home modification market demands unique skills delivered by professional renovators and other experts working together. Effective home modification projects bring together a team that can include occupational therapists, mobility equipment suppliers, specialty equipment suppliers (exterior lifts, chair lifts, elevators), medical professionals, and funding organizations.

We are also in favour of voluntary opt-in policies/legislation such as the Home Renovation Tax Credit for Seniors and Persons with Disabilities. Policies of this nature allow for greater flexibility in the implementation of accessibility developments that are specific to the individual's needs, rather than a blanket approach. Furthermore, as explicit documentation is necessary to receive the tax credit, policies of this nature help to combat the underground economy activity and to an extent money laundering.

Health professionals recognize that those needing home modifications for accessibility require individual and specific renovations tailored to their unique condition, with attention paid to planning for the progression of that condition so that the renovations continue to serve their purpose into the future. Experts note that the variety of disabilities in the population mean that designing for accessibility means different things for different disabilities; for example, accessible design for mobility can cause problems for those with vision impairments. Mandating a “one-size-fits-all”

solution will not fulfill this need. Therefore, adding general accessibility requirements may not only severely impact affordability but be counterproductive.

Consideration must also be given to industry capacity, product availability, enforcement implications, maintenance costs and other costs that would be handed down to consumers. Regulating accessibility and visitability in private homes may compromise the availability of housing that Canadians need and want.

Supporting the voluntary efforts of CHBA members to improve the accessibility and visitability of homes will help ensure that the industry can deliver housing to meet the needs, wants and budgets of all Canadians.

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.