

No. B18-09  
December 17, 2018

## **Regulatory Changes to Accessible Parking Requirements**

The purpose of this bulletin is to provide information about the removal of historical accessible parking requirements from the BC Building Code and resources to support local governments in regulating accessible parking in their bylaws.

### **Legislation**

Part 14 of the *Local Government Act* [RSBC 2015] enables local governments and the Islands Trust to make decisions on planning and land use within their jurisdiction. Section 525 of the *Local Government Act* provides local governments with the authority to establish off-street parking requirements, including specific design standards for accessible parking.

The *Building Act* [SBC 2015] establishes the Province as the primary authority to establish building requirements. The *Building Act* was adopted to support consistency in the building regulatory system by eliminating the patchwork of building requirements that varied across the province. At the same time, the Province recognized that the need for consistency must be balanced with flexibility in order for local governments to meet specific community needs. Section 5 of the *Building Act* allows for such flexibility by providing local governments the authority to establish building requirements for matters identified as unrestricted by regulation.

There are two reasons for which a matter may be unrestricted under Section 5 of the *Building Act*:

- The matter is subject to a particular location or unique circumstance; therefore, the local government is best positioned to set the requirements; or
- A local government aims to achieve an objective under an existing statutory authority and the enacted building requirement is necessary to achieve that objective.

### **Background**

In February 2016, the Province approved accessible parking spaces as an unrestricted matter under the *Building Act*, for which local governments could retain or establish their own requirements in bylaws. The Building and Safety Standards Branch distributed an information bulletin titled Building Act: Update for Local Governments to support local governments.

The Building and Safety Standards Branch consulted with stakeholders about accessibility requirements in the BC Building Code in February 2018. The consultation feedback on parking generally indicated that the BC Building Code's historical parking requirements were insufficient.

To address the regulatory overlap between the BC Building Code and municipal bylaws and in support of harmonizing the BC Building Code with the National Code, accessible parking provisions are not included in the BC Building Code 2018, which became effective December 10, 2018.

## Regulatory Change

The BC Building Code 2018 is harmonized with the National Building Code 2015, which does not include requirements for accessible parking spaces.

While previous editions of the BC Building Code did provide the minimum requirements for accessible parking in instances where off-street parking was either required by local government bylaw or provided voluntarily by the building owner, the regulatory overlap between the *Local Government Act* and the BC Building Code had the potential to cause confusion regarding which requirements should be followed. Removing historical accessible parking requirements from the BC Building Code 2018 clarifies that local governments are best suited to regulate accessible parking spaces according to their communities' needs. Local governments that do not already have their own accessible parking requirements in their bylaws and instead relied on the provisions in the BC Building Code may wish to consider amending their bylaws to incorporate accessible parking requirements.

The BC Building Code 2018 requires a greater level of building accessibility by combining the requirements of the National Building Code 2015 with BC's historical requirements. In aligning more closely with the National Building Code, the BC Building Code achieves greater consistency not only with the National Building Code, but also with codes from other Canadian jurisdictions.

## Resources

Several resources are available to support enhancing accessible parking, as outlined below.

The Accessible Design for the Built Environment standard (CSA B651-18) provides guidance on accessible parking standards. Local governments who do not already regulate accessible parking may adopt these standards or establish requirements that work best for their communities.

The City of Ottawa developed Accessibility Design Standards to support the design of accessible on and off-street parking.

The Accessibility for Ontarians with Disabilities Act: Integrated Accessibility Standards includes requirements governing the design of public spaces in the built environment.

The Social Planning and Research Council, with input from various communities, developed an Accessible Community Bylaw Guide. For a sample Model Accessible Parking Bylaw, please review pages 72-25.

## British Columbia Building Code 2018

Although accessible parking is no longer regulated by the BC Building Code, guidance to support local governments to establish accessible parking requirements in their bylaws is available in the Notes of the BC Building Code.

## Implications

Local governments that do not already have accessible parking requirements in their bylaws may wish to develop requirements that meet the specific needs of their communities. Bylaws with existing accessible parking requirements will continue to apply without overlap with the BC Building Code.

Local governments are best positioned to set accessible parking requirements based on the demographics, types of buildings developed, and the specific needs of their communities.

**Communities without specific bylaw provisions will be unable to enforce minimum standards for accessible parking after December 10, 2018.**

Scheme	BC Building Code 2012	BC Building Code 2018
<b>Local Government Bylaw with Accessible Parking Requirement</b>	<p>Local bylaw applies.</p> <p>Building owners must provide the minimum number of accessible parking spaces in the BC Building Code or, if accessible spaces are required in the local bylaw, the minimum number of accessible spaces in the bylaw.</p> <p>Building owners must comply with which ever requirement is greater.</p>	Local bylaw applies.
<b>Local Government Bylaw without Accessible Parking Requirement</b>	Where parking is required by local government, or parking is provided voluntarily by the building owner, building owners are required to comply with the minimum accessibility requirements in the BC Building Code.	The 2012 accessibility requirements are provided in the Notes of the 2018 BC Building Code. Local governments can amend their bylaw to reproduce these requirements or to include their own. In the absence of accessible parking requirements in bylaws, local governments will be unable to enforce minimum standards for accessible parking.
<b>Code Provisions</b>	<p>One of every 100 spaces must be accessible when 50 or more spaces are provided.</p> <p>Minimum width of 3.7m required.</p>	Guidance provided in the Notes of the BC Building Code.

## More Information

Please direct any questions about developing new bylaws to:

Ministry of Municipal Affairs and Housing  
Planning and Land Use Management Branch  
Telephone: 250-387-3394  
Email: [PLUM@gov.bc.ca](mailto:PLUM@gov.bc.ca)

Please direct any questions about technical code requirements to:

Ministry of Municipal Affairs and Housing  
Building and Safety Standards Branch  
Telephone: 250-387-3133  
Email: [Building.Safety@gov.bc.ca](mailto:Building.Safety@gov.bc.ca)

Full text of Part 14 of the *Local Government Act* – Planning and Land Use Management:  
[http://www.bclaws.ca/civix/document/id/complete/statreg/r15001\\_14](http://www.bclaws.ca/civix/document/id/complete/statreg/r15001_14)

Full text of the *Building Act*:  
<http://www.bclaws.ca/civix/document/id/complete/statreg/15002#part1>

Full text of the *Accessibility for Ontarians with Disabilities Act*:  
<https://www.ontario.ca/laws/statute/05a11>

For more information about the changes to accessibility requirements, please see technical bulletin  
[18-05: Accessibility in the British Columbia Building Code 2018.](#)

**From:** [OHCS Building & Safety Standards Branch OHCS:EX](#)  
**To:** s.22  
**Subject:** RE 240869: BC Building Code 2018 - Accessibility  
**Date:** October 9, 2018 11:45:00 AM

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Dear s.22

Thank you for your September 6, 2018 email regarding accessible parking requirements in the BC Building Code 2018. As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

The British Columbia Building Code 2018 provides code users with the option to either use the CSA B651, "Accessible Design for the Built Environment" standard or specified design criteria that establishes what is required for a parking space or facility to be considered 'accessible'.

As indicated in your email, the City of Victoria does not currently have a bylaw that addresses accessible parking spaces. Perhaps you may consider participating in any opportunities that arise to inform the development or amendment of City bylaws related to parking requirements.

For more information regarding the changes to the accessibility provisions in the BC Building Code 2018, please refer to the [Accessibility Technical Bulletin](#) on the Building and Safety Standards Branch website.

Thank you again for writing.

Sincerely,

Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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**From:** s.22  
**Sent:** Thursday, September 6, 2018 9:14 AM  
**To:** OHCS Building & Safety Standards Branch OHCS:EX  
**Subject:** BC Building Code 2018 - Accessibility  
Mr Pape-Salmon:

Given that many communities have not included accessible parking requirements in their existing by laws, including our provincial capitol, I am curious what will remain in the BC Building Code with respect to accessible parking. Your department's statement that the BC Building Code follows the National Building Code with respect to accessibility appears to be extremely misleading as the NBC specifically defers any item not covered specifically in the code its self to the Canadian Standards Association Standard B651. Unless this change has been made to the BC Code to include a similar statement, it would appear that the press release is far from correct.

I look forward to your reply with additional information, before providing additional information to concerned parties.

Sincerely,

s.22



**From:** OHCS Building & Safety Standards Branch OHCS:EX  
**To:** s.22  
**Subject:** RE 240989: Code problem  
**Date:** October 9, 2018 11:39:00 AM

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Dear s.22 :

Thank you for your September 14, 2018 email regarding accessible parking spaces. As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

You are correct that the City of Kamloops is responsible for determining the number of accessible off-street parking spaces in accordance with its bylaws and the B.C. Building Code. The Building and Safety Standards Branch has no jurisdiction in this matter.

I appreciate that you have already made the City aware of your concerns about an existing development. Going forward, you may want to take advantage of any opportunities that arise to inform the development or amendment of City bylaws related to parking requirements.

Thank you again for taking the time to write and I'm sorry I couldn't be of greater help.

Sincerely,

Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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-----Original Message-----

From: s.22

Sent: Friday, September 14, 2018 12:39 PM

To: OHCS Building & Safety Standards Branch OHCS:EX

Subject: Code problem

Hi, if you could please forward this to the proper department it would be much appreciated.

I was at a brand new hotel with two restaurants in Kamloops, The Sandman hotel with Moxies and Sharksclub all on the same property. On the whole property there are only 2 accessible spots. No accessible spots in their underground parking for the hotel. No accessible parking spots near the entrance to the restaurants. The hotel should have to have a minimum amount of accessible spots in relation to the number of beds in the hotel.

I would like to point out that its complete BS that you have turned over parking requirements to the local municipalities to determine requirements and placement.

It is obvious that the City of Kamloops Planning department is stuck in the 1950s and needs someone to tell them what to do.

Not sure if there is anything you can do, the city of Kamloops seems to think its okay. I have pointed it out to them.

thanks for your assistance

s.22

## OHCS Building & Safety Standards Branch OHCS:EX

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**From:** OHCS Building & Safety Standards Branch OHCS:EX  
**Sent:** December 19, 2018 11:16 AM  
**To:** s.22  
**Cc:** Minister, MAH MAH:EX  
**Subject:** RE 242233: Accessible Parking

Dear s.22

Thank you for your October 30, 2018 email addressed to the Honourable Selina Robinson, Minister of Municipal Affairs and Housing, and I regarding accessing government buildings. As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

I appreciate your feedback regarding accessible parking. The Ministry of Citizens' Services is working to further accessibility in government owned and leased buildings by meeting the barrier free access mobility standards.

The Province is committed to [Building a Better BC for People with Disabilities](#). This 10-year action plan is designed around 12 building blocks, some of which are specifically directed at preventing and removing barriers in the built environment. The Ministry of Municipal Affairs and Housing is supporting this plan through the adoption of accessible building code provisions and the creation of more accessible housing options.

In July 2018, the Province adopted the BC Building Code 2018 which is based on the National Building Code 2015. The BC Building Code combines the requirements of the National Building Code with some of BC's historical requirements to require a greater level of building accessibility.

New requirements help improve accessibility in small retail shops and stores, and common areas of condominium and apartment buildings, as well as permit greater flexibility in design choices. Prior to adopting the new accessibility requirements, the Building and Safety Standards Branch invited the public and stakeholders to review and provide comments on the proposed changes. Ninety percent of respondents supported the changes.

One of the changes in the BC Building Code is the removal of accessible parking requirements that public feedback told us were outdated and inadequate. In support of harmonizing with the National Building Code, the changes clarify that local governments can best the needs of their communities by adopting accessible parking requirements based on the demographics, types of buildings developed, and their specific community needs. For information about the removal of historical accessible parking requirements in the BC Building Code, please see information bulletin B18-09: Regulatory Changes to Accessible Parking on our [website](#).

In the same way BC conducted a public review of proposed code changes, there is currently a public review on proposed changes to the National Building Code of Canada. Please visit the National Research Council of Canada's [website](#) to review the proposed code changes, which if approved by the Canadian Commission on Building and Fire Codes Committee will be published in the 2020 edition of the National Building Code. This is your opportunity to provide comments on proposed national code changes that may be adopted into the next edition of the BC Building Code.

To receive regular email updates about accessibility in BC, please email the Accessibility Secretariat at [accessibility@gov.bc.ca](mailto:accessibility@gov.bc.ca) to request to be added to their distribution list.

Thank you again for your feedback.

Sincerely,



Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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**From:** s.22

**Sent:** October 30, 2018 8:39 AM

**To:** Minister, MAH MAH:EX ; Pape-Salmon, Andrew OHCS:EX

**Subject:** accessible parking

Dear Andrew Pape-Salmon, Executive Director, Office of Housing and Construction Standards. and  
Hon. Selina Robinson, Minister of Municipal Affairs and Housing

Can you please explain to me how someone with disabilities is able to magickally transport themselves 2 blocks to your office from a parking spot? Or is this a design to keep us from accessing your services? Which would be discrimination.

Please use common and compassionate sense in making your agency accessible soonest and in your bylaws and regulations for other such buildings. Leaving it to other agencies is not sufficient as this way of thinking creates loop holes and massive gaps that leave us with more challenges and hurdles to overcome. We are a modern society. It is inappropriate to not use modern and compassionate choices.

Regards,

s.22

**From:** [OHCS Building & Safety Standards Branch OHCS:EX](#)  
**To:** s.22  
**Subject:** RE 242562: Removal of HC Parking  
**Date:** December 19, 2018 10:10:00 AM

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Dear s.22

Thank you for your November 27, 2018 email regarding accessible parking. As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

The Province is committed to [Building a Better B.C. for People with Disabilities](#). This 10-year action plan is designed around 12 building blocks, some of which are specifically directed at preventing and removing barriers in the built environment. The Ministry of Municipal Affairs and Housing is supporting this plan through the adoption of accessible building code provisions and the creation of more accessible housing options. In addition, the Ministry of Citizens' Services is working to further accessibility in government owned and leased buildings by meeting the barrier free access mobility standards.

In July 2018, the Province adopted the BC Building Code 2018 which is based on the National Building Code 2015. The BC Building Code combines the requirements of the National Building Code with some of BC's historical requirements to require a greater level of building accessibility.

New requirements help improve accessibility in small retail shops and stores, and common areas of condominium and apartment buildings, as well as permit greater flexibility in design choices. Prior to adopting the new accessibility requirements, the Building and Safety Standards Branch invited the public and stakeholders to review and provide comments on the proposed changes. Ninety percent of respondents supported the changes.

One of the changes in the BC Building Code is the removal of accessible parking requirements that public feedback told us were outdated and inadequate. In support of harmonizing with the National Building Code, the changes clarify that local governments can best meet the needs of their communities by adopting accessible parking requirements based on the demographics, types of buildings developed, and their specific community needs. For information about the removal of historical accessible parking requirements in the BC Building Code, please see information bulletin B18-09: Regulatory Changes to Accessible Parking on our [website](#).

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To receive regular email updates about accessibility in BC, please email the Accessibility Secretariat at [accessibility@gov.bc.ca](mailto:accessibility@gov.bc.ca) to request to be added to their distribution list.

Thank you again for writing.

Sincerely,

Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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**From:**s.22

**Sent:** Tuesday, November 27, 2018 10:15 AM

**To:** OHCS Building & Safety Standards Branch OHCS:EX

**Subject:** removal of HC parking

I was stunned to hear the suggestion of removing parking stalls for the handicapped from the building code. I would suggest maybe those who are planning these changes take a trip in a wheel chair or scooter to go shopping for groceries, doctor appointments and etc. We need to give the handicapped more access and protection so they can live on their own or at least stay in their home. Apartments, condos and etc. should have 36" doors; bathrooms that will accommodate someone who is in a wheel chair; built so renovations if needed would not be the nightmare it usually is. Governments should be encouraging builders a tax break if in every building a percentage of the units are available for handicapped people. I am talking from years of experience helping and caring for handicapped people, fighting for access to hotels, stores and etc. Keeping more people in their own homes will save the Governments money.

s.22

**From:** [OHCS Building & Safety Standards Branch OHCS:EX](#)  
**To:** [s.22](#)  
**Cc:** [OfficeofthePremier, Office PREM:EX](#)  
**Subject:** RE 242661: PO Log 716480 [s.22](#)  
**Date:** December 19, 2018 11:09:00 AM  
**Attachments:** [image001.jpg](#)

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Dear [s.22](#)

Thank you for your November 23, 2018 email addressed to Honourable John Horgan, Premier of British Columbia, regarding changes to accessible parking requirements in the British Columbia Building Code (BC Building Code). As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

The Province is committed to [Building a Better B.C. for People with Disabilities](#). This 10-year action plan is designed around 12 building blocks, some of which are specifically directed at preventing and removing barriers in the built environment. The Ministry of Municipal Affairs and Housing is supporting this plan through the adoption of accessible building code provisions and the creation of more accessible housing options. In addition, the Ministry of Citizens' Services is working to further accessibility in government owned and leased buildings by meeting the barrier free access mobility standards.

In July 2018, the Province adopted the BC Building Code 2018 which is based on the National Building Code 2015. The BC Building Code combines the requirements of the National Building Code with some of BC's historical requirements to require a greater level of building accessibility.

New requirements help improve accessibility in small retail shops and stores, and common areas of condominium and apartment buildings, as well as permit greater flexibility in design choices. Prior to adopting the new accessibility requirements, the Building and Safety Standards Branch invited the public and stakeholders to review and provide comments on the proposed changes. Ninety percent of respondents supported the changes.

One of the changes in the BC Building Code is the removal of accessible parking requirements that public feedback told us were outdated and inadequate. In support of harmonizing with the National Building Code, the changes clarify that local governments can best meet the needs of their communities by adopting accessible parking requirements based on the demographics, types of buildings developed, and their specific community needs. For information about the removal of historical accessible parking requirements in the BC Building Code, please see information bulletin B18-09: Regulatory Changes to Accessible Parking on our [website](#).

In the same way BC conducted a public review of proposed code changes, there is currently a public review on proposed changes to the National Building Code of Canada. Please visit the National Research Council of Canada's [website](#) to review the proposed code changes, which if approved by the Canadian Commission on Building and Fire Codes Committee will be published in the 2020 edition of the National Building Code. This is your opportunity to provide comments on proposed national code changes that may be adopted into the next edition of the BC Building Code.

To receive regular email updates about accessibility in BC, please email the Accessibility Secretariat at [accessibility@gov.bc.ca](mailto:accessibility@gov.bc.ca) to request to be added to their distribution list.

Thank you again for writing.

Sincerely,

Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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**From:** s.22

**Sent:** Friday, November 23, 2018 3:12 PM

**To:** Chen.MLA, Katrina <[Katrina.Chen.MLA@leg.bc.ca](mailto:Katrina.Chen.MLA@leg.bc.ca)>; Horgan.MLA, John <[John.Horgan.MLA@leg.bc.ca](mailto:John.Horgan.MLA@leg.bc.ca)>

**Subject:** Accessible Parking

I am a mother of a disabled child. Please do not allow your government to make this change in the BC building code re accessible parking requirements.

This is a step backward. It is not progress.

I am so furious. This will only create regional inequities in accessibility.

I have always voted NDP and thought of the party as a champion for progressive thinking. I have never been so disappointed.

I am appalled. Cities will have different rules and will be enticed to reduce the number and/or size of accessible parking by developers.

Please I implore you to do something about this before it is too late.

Thank you for your consideration.

s.22

[https://globalnews.ca/news/4692689/b-c-accessible-parking-local-government/?utm\\_source=%40globalbc&utm\\_medium=Twitter](https://globalnews.ca/news/4692689/b-c-accessible-parking-local-government/?utm_source=%40globalbc&utm_medium=Twitter)

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B.C. government shifting  
accessible parking  
requirements to local  
governments |  
Globalnews.ca

A big change to B.C.'s building code is raising concerns over the future of accessible parking in the province. Starting Dec. 10, the province will remove the requirement for accessible parking ...

globalnews.ca

**From:** [OHCS Building & Safety Standards Branch OHCS:EX](#)  
**To:** s.22  
**Cc:** [OfficeofthePremier, Office PREM:EX](#)  
**Subject:** RE 242666: accessible parking  
**Date:** December 19, 2018 10:48:00 AM

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Dear s.22

Thank you for your November 19, 2018 email addressed to Honourable John Horgan, Premier of British Columbia, regarding changes to accessible parking requirements in the British Columbia Building Code (BC Building Code). As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

The Province is committed to [Building a Better B.C. for People with Disabilities](#). This 10-year action plan is designed around 12 building blocks, some of which are specifically directed at preventing and removing barriers in the built environment. The Ministry of Municipal Affairs and Housing is supporting this plan through the adoption of accessible building code provisions and the creation of more accessible housing options. In addition, the Ministry of Citizens' Services is working to further accessibility in government owned and leased buildings by meeting the barrier free access mobility standards.

In July 2018, the Province adopted the BC Building Code 2018 which is based on the National Building Code 2015. The BC Building Code combines the requirements of the National Building Code with some of BC's historical requirements to require a greater level of building accessibility.

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To receive regular email updates about accessibility in BC, please email the Accessibility Secretariat at [accessibility@gov.bc.ca](mailto:accessibility@gov.bc.ca) to request to be added to their distribution list.

Thank you again for writing.

Sincerely,

Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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**From:** s.22

**Sent:** November 19, 2018 10:53 AM

**To:** OfficeofthePremier, Office PREM:EX <Premier@gov.bc.ca>

**Subject:** accessible parking

*Dear Premier:*

*I'm writing to ask why, as of December 10 2018, new developments will no longer be required to provide accessible parking for people with disabilities? This is terribly wrong. I know it's hard for someone who is physically able to get around to understand how being able to park close to where you're going is very important. It's also important to have a parking space larger than normal, so that the disabled persons door can be opened wide to make it easier for them to get out of the car. Not to mention the fact that some disabled people have vans with side doors and ramps to remove passengers who are in wheelchairs. Put back this requirement!*

*I'd also like to take this opportunity to talk about the poverty reduction supplement that I started getting from the BC government about 3 months ago. It has to be a joke. I'm getting a dollar. Really? A dollar? It's an absolute insult to me. I can't even buy a quart of milk with that.*

*Sincerely,*

s.22



**From:** [OHCS Building & Safety Standards Branch OHCS:EX](#)  
**To:** [s.22](#)  
**Cc:** [OfficeofthePremier, Office PREM:EX](#)  
**Subject:** RE 242668: Disability Parking  
**Date:** December 19, 2018 10:54:00 AM

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Dear [s.22](#)

Thank you for your November 26, 2018 email addressed to Honourable John Horgan, Premier regarding disability parking and strengthening the British Columbia Building Code (BC Building Code). As the Executive Director, Building and Safety Standards Branch, I am pleased to respond.

The Province is committed to [Building a Better B.C. for People with Disabilities](#). This 10-year action plan is designed around 12 building blocks, some of which are specifically directed at preventing and removing barriers in the built environment. The Ministry of Municipal Affairs and Housing is supporting this plan through the adoption of accessible building code provisions and the creation of more accessible housing options. In addition, the Ministry of Citizens' Services is working to further accessibility in government owned and leased buildings by meeting the barrier free access mobility standards.

In July 2018, the Province adopted the BC Building Code 2018 which is based on the National Building Code 2015. The BC Building Code combines the requirements of the National Building Code with some of BC's historical requirements to require a greater level of building accessibility.

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To receive regular email updates about accessibility in BC, please email the Accessibility Secretariat

at [accessibility@gov.bc.ca](mailto:accessibility@gov.bc.ca) to request to be added to their distribution list.

Thank you again for writing.

Sincerely,

Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
Office of Housing and Construction Standards  
Ministry of Municipal Affairs and Housing

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**From:** s.22

**Sent:** Monday, November 26, 2018 5:53 PM

**To:** Horgan.MLA, John

**Subject:** Disability parking

Dear Premier

I am a person with a disability and I can attest to the barriers that people with disabilities face every day. Your government should be championing accessibility and inclusion not deconstructing the modest gains that have been made over the last few decades. 40 % of the world's population have a person with a disability in their immediate circle of family and friends. This is not an insignificant number. It is therefore incumbent upon our elected officials to represent all citizens equally. Accessible infrastructure means inclusion and inclusion equals a vibrant healthy community. We need to strengthen the provincial building code, which has had little improvement (on disability standards) since 1975, not off load the responsibility to local government which frankly have poor records on leadership in this regard. This is a sucker punch to the gut for everyone with a disability, their friends and family.

Sincerely

s.22

## Cottier, Anna OHCS:EX

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**From:** Pape-Salmon, Andrew OHCS:EX  
**Sent:** September 25, 2018 8:58 PM  
**To:** 'bbrohman@rickhansen.com'; 'akurl@rickhansen.com'  
**Cc:** May, Zachary OHCS:EX; Chase, Andy OHCS:EX  
**Subject:** RE: DM MEETING | Brad Brohman & Aparna Kurl, Rick Hansen Foundation Accessibility Certification Program w/Jacquie Dawes, Andrew Pape-Salmon

Greetings Brad and Apurna,

It was a pleasure meeting with you on Monday.

As promised, see our list of code changes related to accessibility. If you have any questions, my colleague Andy Chase can answer them.



Also, I have attached the market transformation slide that we use to illustrate key government levers and voluntary measures that enable widespread adoption of codes and standards.

Finally, we promised to put you in touch with Liam Edwards and Brian Bedford who lead the infrastructure funding from the Branch. Feel free to contact them to request a meeting to discuss the accessibility provisions in the funding and you can copy myself:

[Brian.Bedford@gov.bc.ca](mailto:Brian.Bedford@gov.bc.ca) – Director, based in Victoria

[Liam.Edwards@gov.bc.ca](mailto:Liam.Edwards@gov.bc.ca) – Executive Director, in Halifax part time

Let's keep in touch as you advance your 1,100 certified buildings.

Regards,

*Andrew Pape-Salmon | P.Eng., MRM, FCAE, FCSSE  
Executive Director, Building and Safety Standards Branch  
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Where ideas work



-----Original Appointment-----

**From:** Dawes, Jacquie MAH:EX

**Sent:** August 8, 2018 11:15 AM

**To:** Dawes, Jacquie MAH:EX; 'bbrohman@rickhansen.com'; 'akurl@rickhansen.com'; Pape-Salmon, Andrew OHCS:EX

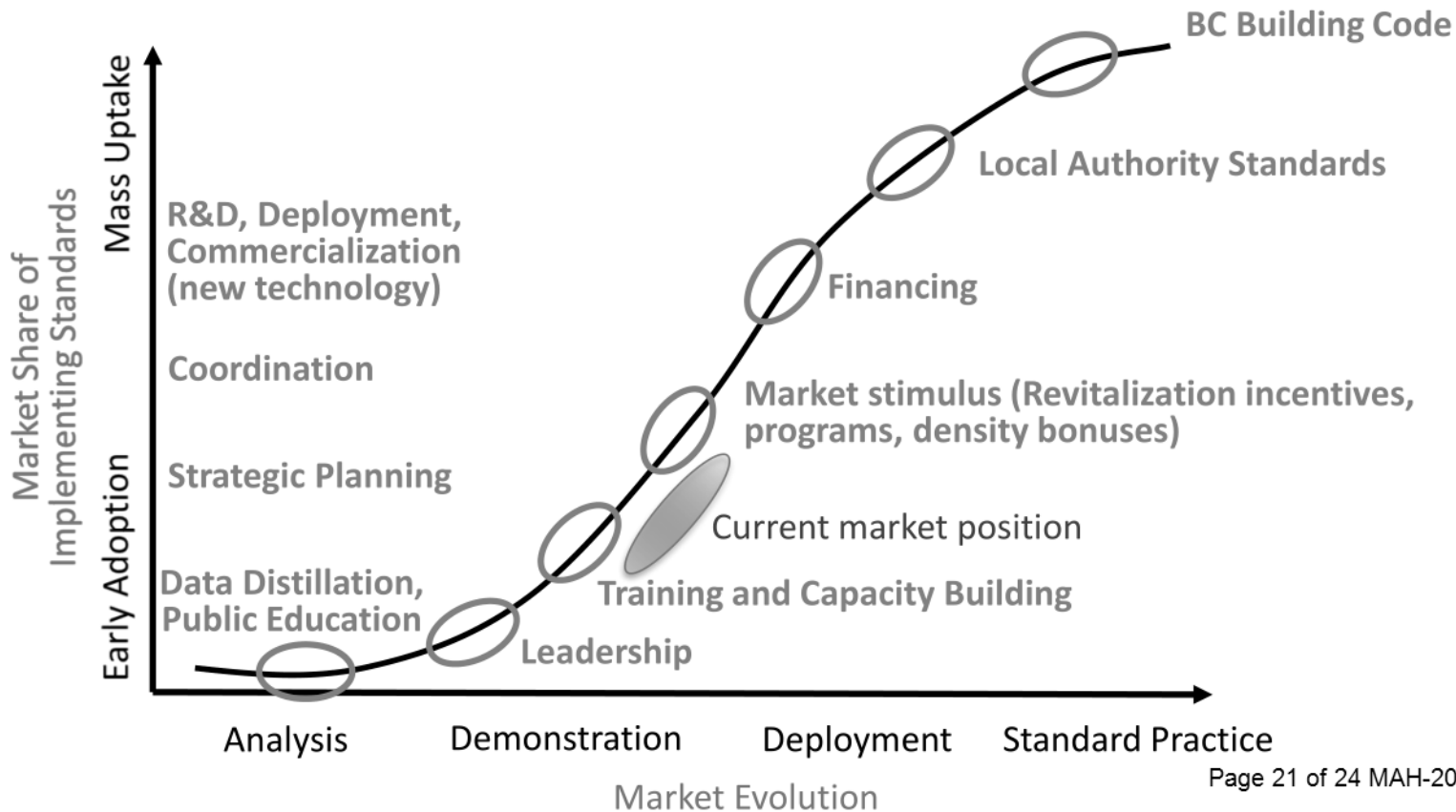
**Subject:** DM MEETING | Brad Brohman & Aparna Kurl, Rick Hansen Foundation Accessibility Certification Program w/Jacquie Dawes, Andrew Pape-Salmon

**When:** September 24, 2018 9:00 AM-10:00 AM (UTC-08:00) Pacific Time (US & Canada).

**Where:** Jacquie Dawes Office | 5th Floor - 800 Johnson St | Victoria BC | Ask for Morgan Genzaes at Security



# Market Transformation



## Comparison of Accessibility Requirements in the British Columbia Building Code 2018 to the 2012 Edition and to the National Building Code of Canada 2015

### Notable Changes to the Accessibility Requirements in the British Columbia Building Code 2018 from the 2012 edition:

- **Access required in small shops and stores** per the NBC 2015 (previous BC exemption discontinued)
- **Access required in all common areas of apartment and condominium buildings**, similar to the NBC 2015
- **50% of all pedestrian building entrances must be accessible** per the NBC 2015, resulting in greater use of power operated doors
- **Permission for Limited-Use / Limited Application (LU/LA) elevators** to allow cheaper option for providing access (LU/LA elevators not permitted in BCBC 2012 or NBC 2015)
- **More accessible seating spaces for wheelchairs required** than in the NBC 2015 or the BCBC 2012
- **Assistive Listening Systems required in all courtrooms** in addition to the spaces required by the NBC 2015
- **Greater required width of doorways** (850 mm) than in the BCBC 2012 or in the NBC 2015
- **Option for design to CSA B651 standard in place of prescriptive Code requirements** per the NBC 2015

### Notable BC-Specific Requirements that are Continued in the British Columbia Building Code 2018 to Require Greater Access:

- **How to apply the Code to alterations and additions** to existing buildings
- **Provisions for dwelling units to be adaptable (Adaptable Dwelling Units)** to facilitate future modification to provide access
- **Visual Warning Systems** (strobe lights connected to fire warning systems) requirements updated and required in more locations
- **Tactile Walking Surface Indicators** (textures surfaces at edges of pedestrian walkways where adjacent surface is at lower elevation) requirements updated and required in more locations
- **Access required to all storeys**; requiring more elevators in more circumstances
- **A Universal Washroom** (private accessible washroom with space for companion) is required in all buildings (and requirements updated per the NBC 2015)
- **Access requirements for sleeping rooms and bed spaces** (applies to some hotel rooms but not within private dwelling units)
- **Greater required width for an accessible path of travel** including ramps (1 500 mm)

The following table contains a more complete list of highlights and indicates the origin of the changes.

Highlights of Changes to Accessibility Requirements		
New British Columbia Building Code 2018	British Columbia Building Code 2012	National Building Code of Canada 2015
<b>Definitions of access and persons with disabilities</b> updated to align with the UN Convention on the Rights of Persons with Disabilities (ratified by Canada)	Historic definition	Historic definition
<b>Functional Statement for Adaptable Dwelling Unit Provisions</b>	No specific functional statement	No Adaptable Dwelling Unit provisions, no specific functional statement
<b>Visual Warning Systems</b> required in a greater percentage of hotel and motel rooms	Visual Warning Systems required in a percentage of hotel and motel rooms	No specific requirement

**Comparison of Accessibility Requirements in the British Columbia Building Code 2018 to the 2012 Edition and to the National Building Code of Canada 2015**

Strobe lights for <b>Visual Warning Systems</b> shall have a luminous intensity of <b>72 candela</b> (bed spaces) or <b>15 candela</b> (not bed spaces)	Strobe lights for Visual Warning Systems shall have a luminous intensity of 2 candela	No specific requirement
<b>850 mm</b> clear opening for doorways	800 mm clear opening for doorways	800 mm clear opening for doorways
Retained: <b>thresholds</b> limited in height and design	thresholds limited in height and design	No specific requirement
<b>Door control hardware</b> must be located between <b>900 mm and 1 100 mm above the floor</b>	Door control hardware must be located not more than 1 200 mm above the floor	Door control hardware must be located not more than 1 200 mm above the floor
<b>Tactile Walking Surface Indicators</b> required in <b>more locations</b> such as landings serving more than 2 dwelling units and on curb ramps	Tactile Walking Surface Indicators required at landings except those serving dwelling units	No specific requirement
More <b>dimensions for design and location of Tactile Walking Surface Indicators</b>	Minimal dimensions for design and location of Tactile Walking Surface Indicators	No Tactile Walking Surface Indicators required, no specific requirements
<b>Limited-Use / Limited-Application (LU/LA) elevators permitted</b>	Not permitted (other requirements prohibit LU/LA technology)	Not permitted (other requirements prohibit LU/LA technology)
Retained: <b>Access</b> required to <b>all storeys</b> (elevators required in more circumstances)	Access required to all storeys (elevators required in more circumstances)	Access required where an elevator is provided (no elevator; no access required)
<b>Access</b> required in <b>small shops and stores</b> (NBC 2015)	Small shops and stores exempted from providing access	Access required in small shops and stores
<b>Access</b> required in <b>all common areas of apartment and condominium buildings</b> (NBC 2015)	Access only required from entrance to elevator of apartment and condominium buildings	Access required except within dwelling units
<b>50%</b> of all pedestrian building <b>entrances</b> must be accessible (NBC 2015)	One main entrance must be accessible	50% of all pedestrian building entrances must be accessible
Retained: <b>Access</b> required to <b>all areas and facilities</b> where persons with disabilities are reasonably expected to make use of	Access required to all areas and facilities where persons with disabilities are reasonably expected to make use of	No specific requirement
Retained: <b>Universal Washroom required</b>	Universal Washroom required	Provisions for Universal Washrooms, but no specific requirement for Universal Washrooms
Retained: larger <b>Universal Washroom room dimensions</b>	Larger Universal Washroom room dimensions	Smaller Universal Washroom room dimensions
<b>Option for design to CSA B651 standard</b> in place of prescriptive Code requirements	No specific permission	Option for design to CSA B651 standard in place of prescriptive Code requirements
Retained: <b>water closet seat</b> height located <b>430 mm to 480 mm above the floor</b>	Water closet seat height located 430 mm to 480 mm above the floor	Water closet seat height located 430 mm to 460 mm above the floor
Retained: more <b>clear space in front and under lavatory</b>	More clear space in front and under lavatory	Less clear space in front and under lavatory
<b>Greater clear space</b> in front of <b>plumbing fixtures</b>	Inconsistent clear space in front of plumbing fixtures	Inconsistent clear space in front of plumbing fixtures

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<b>Greater clear space</b> in front of <b>facilities</b> such as counters, telephones, and seating areas	Inconsistent clear space in front of facilities	Inconsistent clear space in front of facilities
<b>More seating spaces for wheelchairs required</b> than in the NBC 2015 (or BCBC 2012)	Some seating spaces for wheelchairs required	More seating spaces for wheelchairs required than in the BCBC 2012
<b>Controls</b> required to be mounted <b>455 mm to 1 200 mm above the floor</b>	Controls required to be mounted 400 mm to 1 200 mm above the floor	Controls required to be mounted 400 mm to 1 200 mm above the floor
<b>Electrical outlets</b> intended to be used by the occupants <b>required to be accessible</b> (in addition to other controls intended to be operated by the occupant)	Controls intended to be operated by the occupant required to be accessible	Controls intended to be operated by the occupant required to be accessible
<b>Foot controls</b> for <b>power door operators</b> (NBC 2015)	No specific requirement	Foot controls for power door operators
<b>Assistive Listening Systems</b> required in <b>all courtrooms</b> and all spaces required in the NBC 2015	Assistive Listening Systems required in auditoria and theatres greater than 100 m <sup>2</sup> in area	Assistive Listening Systems required in classrooms, auditoria, meeting rooms, and theatres greater than 100 m <sup>2</sup> in area
Retained: <b>signs</b> required to indicate the <b>location of more building facilities</b>	Signs required to indicate the location of more building facilities	Signs required to indicate the location of some building facilities
Retained: requirements for <b>access</b> in some <b>sleeping rooms and bed spaces</b> (within hotels and motels, not within dwelling units)	Requirements for access in some sleeping rooms and bed spaces (within hotels and motels, not within dwelling units)	No specific requirements
Retained: <b>1 500 mm clear width</b> for an accessible <b>path of travel</b>	1 500 mm clear width for an accessible path of travel	920 mm clear width for an accessible path of travel
Retained: <b>1 500 mm clear width</b> for an accessible <b>ramp</b>	1 500 mm clear width for an accessible ramp	870 mm clear width for an accessible ramp
Minimum <b>clear area</b> required adjacent accessible <b>sliding doors</b>	No specific requirement	No specific requirement
Minimum <b>illumination</b> for accessible <b>path of travel</b>	No specific requirement	No specific requirement
Retained: <b>application</b> of Code to <b>alterations and additions</b> to existing buildings	Application of Code to alterations and additions to existing buildings	No specific requirements
Retained: provisions for <b>Adaptable Dwelling Units</b>	Provisions for Adaptable Dwelling Units	No specific requirements
<b>Site Plans</b> to show accessible <b>path of travel to parking stalls and passenger loading zones</b>	No specific requirement	No specific requirement
<b>Silent on characters on signs</b> (guidance offered in Notes, but not enforceable)	Specific requirements for characters on signs	No specific requirements
<b>Silent on parking space dimensions</b> (guidance offered in Notes per NBC 2015, but not enforceable)	Specific, but incomplete, requirements for parking space dimensions	Guidance on parking space dimensions offered in Notes (but not enforceable)