



Report on Relocated Homes Bylaws and Benefits

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Context

Bylaw 3114; PART 11: Building Move 11.1

The purpose of this report is to advocate for and guide the revision of building bylaw 11.1, as well as the development of processes to support revisions to building bylaw 11.1. Revisions to this bylaw would allow relocated homes into the City of Courtenay as existing homes regardless of age, lessening the carbon footprint of local development projects, and creating an additional affordable housing option within the City.

BYLAW 3114; PART 11: BUILDING MOVE 11.1

No person may move a building or structure into or within the City except:

- (a) where certified by a registered professional that the building, including its foundation, will substantially comply with the current version of the building code;
- (b) the owner of the premises onto which the building is proposed to be moved has provided documentation that the age of the building or structure is not greater than 15 years old; and
- (c) a building permit has been issued for the building or structure.

Nickel Bros

As a founding member of the BC Structural Movers' Association, Nickel Bros is one of the largest non-government-subsidized recyclers in North America. Nickel Bros has safely performed over 10,000 structural moves since 1956. Led by the mentorship and vision of Jeremy Nickel, Nickel Bros persists to provide communities with affordable and sustainable living options. Nickel Bros' contributions to Building Code clarity and education in BC have been endorsed by 29 industry organizations and non-profits.

Cassidy v. Ros

Cassidy v. Ros is a subject matter expert specializing in; Densification and Decarbonization Through Circular Building, Div A, Div B Appx. C and Part 9 Federal and BC Building Code, and Accessibility Within Resource Recovery. Her efforts to support building code development in BC have been recognized by the Minister of Housing and the Deputy Assistant Minister of Housing. Cassidy is a member of the Recycling Council of BC Board of Directors, and was recently nominated for a Federal Technical Committee by 8 organizations in BC and Ontario.

Introduction

In 2023, the Federal government released a study with a new codes consultation, in response to concerns about existing homes seismic upgrades. It was found that many older homes have been shown to exceed current construction standards. For instance, lath and plaster construction demonstrated up to 440% more shearing capacity than homes built to current code standards.

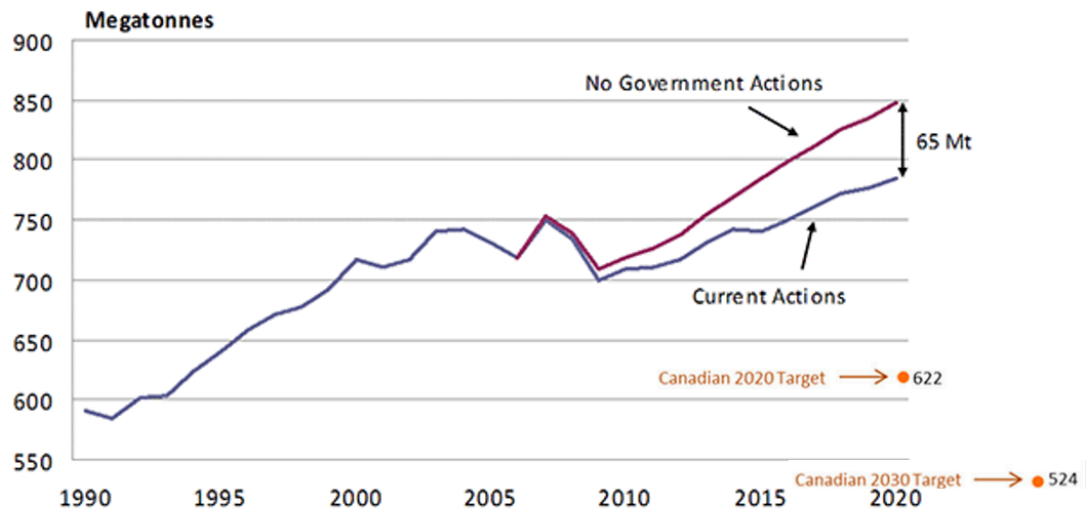
Other common construction practices that have since been deemed “out-dated,” yet show superior resilience in high wind and seismic risk areas include:

- a. Wall sheathing with longer laps over the floor perimeter,
- b. Bridging between studs and floor joists,
- c. 16 inch on centre framing,
- d. Dimensional lumber,
- e. Diagonal board sheathing.

The Provincial government echoed this support in their 2024 bulletin after public outcry for demolition alternatives and low-carbon affordable housing options, stating: “Relocation of a building as an alternative to demolition can have positive environmental impacts due to its reduction of both demolition waste and the use of new resources.” Reducing waste in landfills has been reaching a critical point in BC, with some landfills now retaining a life expectancy of less than 5 years. Considering the rate of demolition in many municipalities, demolition waste is an easy target for reduction, and currently represents roughly $\frac{1}{3}$ of all landfill waste. That landfill waste also contains embodied carbon, which contributes to climate change as it is released when materials break down.

BC homes built pre-2016 (representing roughly 83% of BC buildings) emit around 140,000kgs of operational carbon in a 60 year lifespan (it is important to note that this number does not account for energy efficiency upgrades that will occur over time as part of necessary maintenance. (Ie. Hot water tanks, windows, heat pumps). Comparatively, homes with a “strong” compliance within BC Energy Step Code are expected to emit around 48,000kgs of operational carbon in a 60 year lifespan. Both categories of homes will contain around 70,000kgs of embodied carbon representing materials, production and manufacturing emissions, and emissions created during building. (<https://www.communityenergy.ca/projects/embodied-emissions/>)

We know that the strategy of prioritizing new buildings in favor of operational emissions has not been effective in limiting emissions, and when we look at these numbers it is easy to understand why. Every time a pre-2016 home is demolished to make way for a new one, 188,000kgs of emissions are created through the demolition of the existing home, and then the life cycle of that new building.

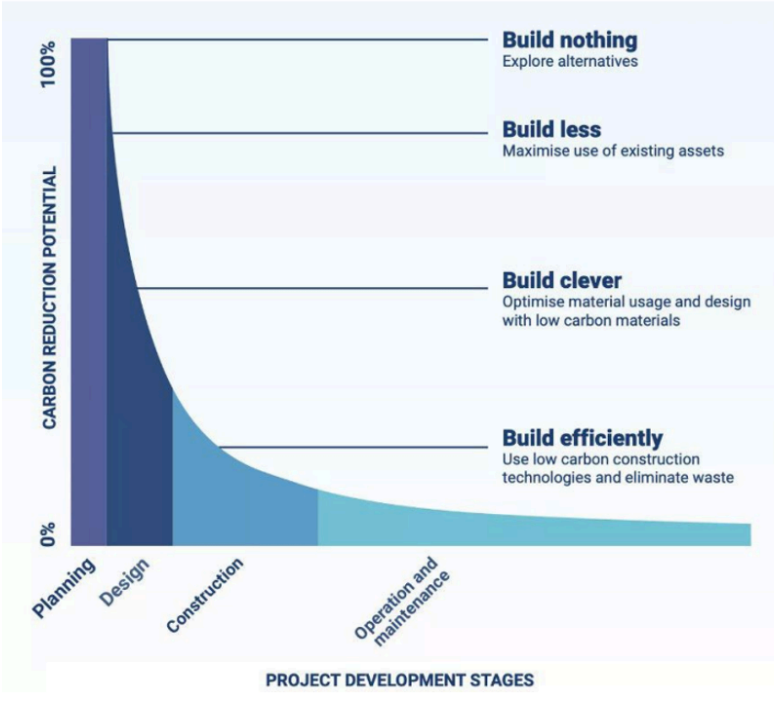


Canada agreed at COP21 to reduce carbon dioxide emissions to 524 megatonnes per year by 2030.



At current rates, Canada will emit 875 megatonnes annually by 2030.

While many jurisdictions are still neglecting C&D embodied carbon regulations, some Cities, like Vancouver, have been sending out the distress signal: “To meet the target of a 40 percent reduction in embodied carbon, new homes will need to achieve an emissions intensity of 120 kg CO₂e/m² by 2030. The three most impactful material categories are concrete (36 percent of total emissions across all homes), insulation (21 percent) and interior surfaces (10 percent).” (City of Vancouver and Builders For Climate Action.)

What is the easiest way to reduce embodied emissions from these categories? Stop producing these materials!



It is additionally important to note that a life cycle of 60 years (the period utilized in most LCAs on the topic) is not long enough for any home to complete its carbon payback period - Each building would need to be in continued use for 168 years to begin having a positive operational impact that outweighs the embodied emissions of building it. This indicates that prioritization of extending building lifetimes is an important - but seemingly overlooked - factor in operational carbon goals. (UBC Teardown Index)

<p>109 trees 144,720 kgs embodied carbon 157 years to complete carbon cycle \$100 / sq.ft. to relocate</p>	<p>80 trees 104,000 kgs embodied carbon 136 years to complete carbon cycle \$188 / sq.ft. to relocate</p>
	
<p>Built 2012</p>	<p>Built 1997</p>

Recommendations:

1. Municipal policy for relocated homes should reinforce their designation as existing homes.

See supporting documents on pages 21 through 26.

By implementing policies that align with building code intent, we can divert waste from regional landfills, secure affordable housing for British Columbians, and cooperatively contribute to zero emissions goals. Harmonization between Federal, Provincial and Regional policies provides clear directives to local developers and building officials, ensuring regulations are easy to communicate and understand, and that they support end goals with similar language. Applying language and policy consistent with the BCBC and NBC also allows building officials to directly reference NRC User Guides should they require further guidance

See examples of current bylaws in other jurisdictions on pages 10 through 20.

2. Create Streamlined Building Move-On Permit Process Policy:

Allow relocated homes to be delivered to their destination site prior to the building permit being issued via an Expedited Move-On Permit. The Expedited Move-On Permit is best structured as a separate and stand-alone permit application and process. Expedited Move-on permits are best supported by the following minimum requirements:

- a. Site and elevation plan
- b. Confirmation the building fits within setbacks, and current zoning requirements
- d. Engineer's report for the relocated building certifying that it is safe for continued occupancy.

Expedited Move-On Permits relieve recipients utilizing this affordable housing option of having to pay storage fees, by facilitating delivery at the destination site at the same time as removal from the origin site. These additional costs can have a large impact on affordability. Move-On Permit applications additionally create a timing incentive for the home to be relocated, and not machine demolished.

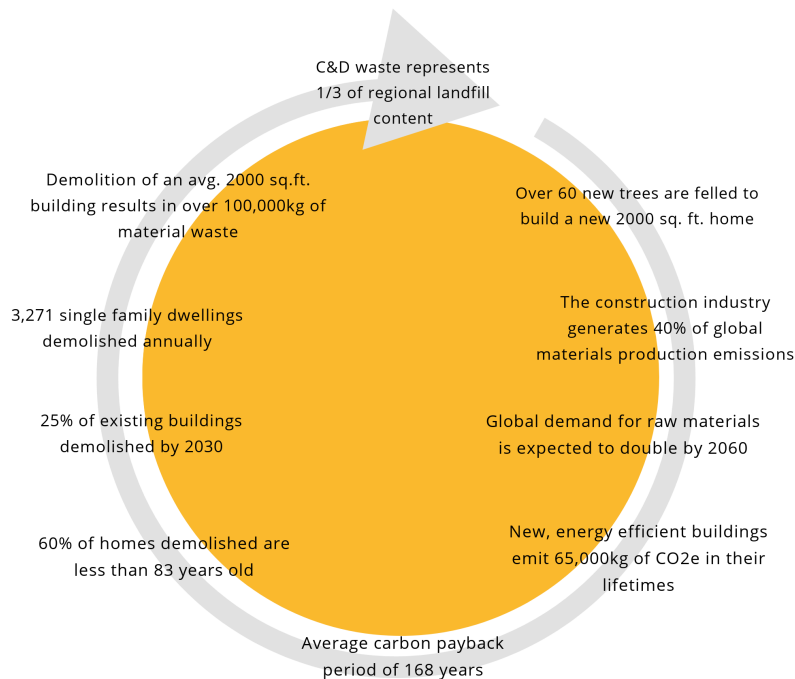
Some municipalities which utilize a move-on permit are referenced on pages 8 through 18.

- Require reuse of pre-70s buildings, and encourage re-use of post-70s buildings through the implementation of a building reuse assessment form with all demolition permit applications.

The Building Reuse Assessment form will require a building relocation company and a deconstruction company to sign off on the building's suitability for reuse.

For pre-70s homes, committing to one of these options would be a requirement of receiving a demolition permit. (Ie. City of Vancouver.)

For post-70s homes, this would increase awareness of reuse options for developers prior to demolition permits being in hand. Increasing lead time for these services allows them to compete with demolition contractors as equals. Home relocation and deconstruction are often no longer attractive options after permits are received purely due to their processes being longer than machine demolition, and developer's wanting to move ahead as quickly as possible once permits are in hand.



*based on Metro Vancouver statistics

4. Refundable Demolition Deposit Policy:

Municipalities should require a \$15,000 - \$20,000 demolition deposit for all single family homes. This deposit is returned if the applicant proves the home was relocated or 3.5KG per sq ft of finished floor space is deconstructed and salvaged. The deposit is also returned if the applicant demonstrates the home was not suitable for either relocation or deconstruction (see Section 1: Responsible Building Removal Assessment). The deposit should only be kept if the applicant confirms the home was suitable for relocation or deconstruction and they chose to proceed with machine demolition regardless.

In partnership with the mandatory assessment, the demolition deposit provides a financial incentive for the applicant to strongly consider implementing the most responsible removal solution. In the instance where a home is assessed to not be able to be relocated or deconstructed, the deposit is returned. Many municipalities are implementing some combination of these deposits. Home relocation should be clearly identified as a viable option for an applicant to receive their deposit. Many bylaws and policies have too narrowly focused on wood or material recycling/salvage. Communicating home relocation as a viable option is key.

5. Early Green Removal Permits Policy:

Time is money! If a home is deemed to be a candidate for home relocation or deconstruction, demolition permits will be decoupled from building permits so that removal of the building can begin at any time prior to a building permit being received.

If the applicant chooses to have the building machine demolished, the demolition permit cannot be issued until a building permit is issued, to ensure that a building is not torn down only for the property to sit as an empty lot. (This is a policy most municipalities already have enacted for all applications within their jurisdictions, and so would remain in place for machine demolitions only.)

6. Municipal Building Removal Procurement Standards Policy

Update Courtenay's demolition procurement criteria for public projects. Whenever a building (residential, commercial, institutional) owned by the City is slated for demolition, the building removal tender criteria should prioritize relocation and then deconstruction.

The tender should be made available to qualified relocation and deconstruction companies, not the general public. Municipalities should be leading the development industry by example. This policy lens would ensure more buildings owned by the City will be treated in the same manner as private buildings.

(Ie. Parks Canada has “alternative use” assessment criteria for heritage and character buildings slated for removal, as well as the Federal Treasury Board Policy on Management of Real Property.)

Additional considerations:

Create educational materials to highlight benefits of the use of low-carbon concrete.

Learn more:

<https://www2.gov.bc.ca/gov/content/environment/climate-change/public-sector/reducing-emissions>

Current bylaws in place in other BC jurisdictions (supportive of home relocation):

Sunshine Coast Regional District

Part 15 - MOVING BUILDINGS AND STRUCTURES ONTO A NEW FOUNDATION 15.1 Buildings may be moved into or within the Regional District provided the following conditions are fulfilled: (1) A building permit to move the building or structure onto a parcel of land or a new location on a parcel of land is obtained prior to any work proceeding. (2) A moved building when placed on the property to which it is being moved must comply with all Zoning Bylaw requirements. (3) The building permit to move a building or structure is valid for a period of 24 months from the date of issuance. Sunshine Coast Regional District Building Bylaw No. 687 Consolidated for convenience only to include up to 687.3 (2020) (4) An application for a building permit to move a building or structure shall: (a) be made in the form prescribed by the Building Official signed by the owner, or a signing officer if the owner is a corporation; (b) include a copy of a title search made within 30 days of the date of the application; (c) include a site plan showing: (i) the bearing and dimensions of the parcel taken from the registered subdivision plan; and the legal description and civic address of the parcel; (ii) the location and dimensions of all statutory rights of way, easements and setback requirements; (iii) the location and dimensions of all existing and proposed buildings or structures on the parcel; (iv) setbacks to the natural boundary of any lake, swamp, pond or watercourse where the Regional District’s Zoning Bylaws establish siting requirements related to flooding; (d) include copies of approvals required under any enactment relating to health or safety. (e) include a foundation design

prepared by a registered professional in accordance with section 4.2 of Part 4 of the Building Code, accompanied by letters of assurance in the form of Schedule B as referred to in Part 2 of Division C of the Building Code, signed by the registered professional; (f) include a professional engineer's report, assessing the structural components of the moved building and listing the life safety issues of the moved building that must be brought up to current Building Code standards. (g) despite the provisions of 15.1(4)(f) the Building Official shall determine compliance of Building Code life safety issues. (h) include plans detailing any and all upgrading required to meet the requirements of this Bylaw, the Plumbing Bylaw and other applicable Bylaws and enactments after the building is moved to a new site. (i) any other information as required by the Building Official

15.2 The requirements of section 15.1(4)(e) may be waived by a Building Official in the circumstances where the Building Official has required a professional engineer's report pursuant to Part 3, Division 8 of the Community Charter and Sunshine Coast Regional District Building Bylaw No. 687 Consolidated for convenience only to include up to 687.3 (2020) the building permit is issued in accordance with sections 56(4) and (5) of the Community Charter.

15.3 The requirements of section 15.1(4)(e) may be waived by a Building Official if documentation, prepared and sealed by a registered professional, is provided assuring that the foundation design substantially complies with section 9.4.4 of Part 9 of the Building Code and the foundation excavation substantially complies with section 9.12 of Part 9 of the Building Code.

15.4 Before receiving a building permit to move a building or structure the Owner shall first pay to the Regional District the building permit fee set out in Schedule B attached to this bylaw.

15.5 Before receiving a building permit to move a building or structure the Owner shall first pay to the Regional District a refundable security deposit in the amount set out in Schedule B attached to this bylaw.

15.6 The security deposit shall be forfeited to the Regional District if any conditions of the building permit are defaulted on, or the building permit expires.

15.7 An application for a building permit to move a Manufactured Home must include proof of the appropriate CSA certification and registration number, foundation details and method of anchorage.

Note: A building inspector, not reasonably, but technically, could require a home to be stripped to studs and reconstructed with modern framing and furring members based on a bylaw requesting Part 9 compliance. However, this would disregard the intention of the code to not cause hardship financially, to decrease carbon emissions, and would disregard its intentions towards existing homes. It is important to remember the intent of the building code when developing and enforcing bylaws.

Shishalh Nation

Part 15 – MOVING BUILDINGS AND STRUCTURES ONTO A NEW FOUNDATION 15.1 Buildings may be moved into or within the SIGD provided the following conditions are fulfilled: (1) A building permit to move the building or structure onto a parcel of land or a new location on a parcel of land is obtained prior to any work proceeding. (2) A moved building when placed on

the property to which it is being moved must comply with all Zoning Bylaw requirements. (3) The building permit to move a building or structure is valid for a period of 24 months from the date of issuance. (4) An application for a building permit to move a building or structure shall: (a) be made in the form prescribed by the Building Official signed by the owner, a signing officer if the owner is a corporation, or an Agent of the owner who has been authorized in writing by the owner; (b) include a copy of a title search made within 30 days of the date of the application; (c) include a site plan for the parcel to or on which the building is to be moved, showing: (i) the bearing and dimensions of the parcel taken from the registered subdivision plan; and the legal description and civic address of the parcel; (ii) the location and dimensions of all statutory rights of way, easements and setback requirements; (iii) the location and dimensions of all existing and proposed buildings or structures on the parcel; and (iv) setbacks to the natural boundary of any lake, swamp, pond or watercourse where the Zoning Bylaw establishes siting requirements related to flooding; (d) include copies of approvals required under any enactment relating to health or safety. (e) include a foundation design prepared by a registered professional in accordance with section 4.2 of Part 4 of the Building Code, accompanied by letters of assurance in the form of Schedule B as referred to in Part 2 of Division C of the Building Code, signed by the registered professional; (f) include a professional engineer's report, assessing the structural components of the building to be moved and addressing with proposed designs and specifications the life safety aspects of the building specified by the Building Official that must be brought up to current Building Code standards; (g) include plans detailing any and all upgrading required to meet the requirements of this Law and other applicable Laws and enactments after the building is moved; and (h) include any other information as required by the Building Official.

Richmond

PART TWELVE: BUILDING MOVE

12.1 Building Permit Application and Fee

- 12.1.1 A **building** or **structure** must not be moved into or within the **City** without the **owner** obtaining a **building permit** and paying the applicable building move inspection fee in the amount set from time to time in the Consolidated Fees Bylaw No. 8636.
- 12.1.2 Salvage for **reuse** of building materials from an existing **building** or **structure** that is to be demolished requires a **building permit**. In addition to any other conditions prescribed by this bylaw, the issuance of such a **building permit** will require the applicant to satisfy the same conditions as those required for a **building permit** for demolition, and to submit a certificate, in the form prescribed by the **building inspector**, confirming that all hazardous materials have been removed from the **building** or **structure**.

7082192

Bylaw No. 7230

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The amount of salvaged material will be considered as contributing to the required recycled content as required by the *Demolition Waste and Recyclable Materials Bylaw 9516*.

Comox Valley Regional District

Part 13: Building Move 13. (1) No person may move a building or structure into or within an area covered by this bylaw building regulation service areas without first obtaining a building permit to carry out such move and to site the building on the parcel to which it is to be moved. (2) An application for a building permit for a building move must be made on the form prescribed by the Building Official, signed by the owner or agent, and must include: (a) A certified structural assessment report from a Registered Professional that the building is suitable for relocation and may be used safely for the use intended; (b) Detailed plans and specifications of the proposed rehabilitation of the building, including foundation plans certified by a professional engineer; and (c) Any other information required by the Building Official or Building Code to establish substantial compliance with this bylaw, the Building Code and other bylaws and enactments relating to the building or structure.

Capital Regional District

2.3.6 Applications for Moved Buildings or Structures (1) A Permit is required for the rehabilitation of a moved building or structure on the property to which it is to be moved. (2) Before issuing a Permit under Section 2.3.6(1), the building official may require certification from a registered professional that the building meets the requirements of this Bylaw, the Building Code and any other applicable enactment.

**APPENDIX D
CONSTRUCTION VALUES FOR SINGLE AND TWO FAMILY DWELLINGS, FACTORY BUILT
HOMES, MOBILE HOMES, AND MOVED BUILDINGS IN THE ELECTORAL AREAS OF JUAN DE
FUCA, SALT SPRING ISLAND, SOUTHERN GULF ISLANDS**

FLOOR AREA OR TYPE OF STRUCTURE	VALUE	
	PER SQ. FT.	PER METER SQ.
Finished Main* Floor Areas	\$200	\$2,152
Finished Areas Other Than Main* Floor	\$150	\$1,614
Finishing previously Unfinished Basement,** Attics, or Other Floors	\$45	\$484.20
Garages and/or Workshops, Barns, or Sheds (Semi-Detached) Floor + Roof + Wall	\$90	\$968.40
Carports (Roof)	\$35	\$376.60
Sundecks (Floor)	\$35	\$376.60
Additions Where an Existing Wall Forms Part of the Additions	\$200	\$2,152
Finished Floor Areas of Factory Build Homes, Mobile Homes or Moved Dwellings	\$100	\$1,076
* Main Floor shall be defined as the floor area where the main activity takes place, usually the floor where the living room, dining room, and/or kitchen are located.		
** Basement shall be defined as in the British Columbia Building Code		

Wei Wai Kum First Nation

21.0 Moving Buildings

- 21.1 No person shall move a building or structure on the Campbell River Indian Reserve # 11, or from place to place within the reserve, unless he has a valid and subsisting approval issued by the Band and/or Building Official.
- 21.2 The Band and/or Building Official shall not issue approval unless a certificate, signed by a registered professional, certifying that the building or structure substantially conforms to the health and safety aspects of the Building Code.
- 21.3 No building or structure may be relocated within the Reserve unless it meets the following conditions:
- (a) It has an appraised value and a home inspection report (independent inspector) that supports its worth.
 - (b) It must be placed on a permanent foundation within three (3) months from the date of issuing the permit;
 - (c) All construction must be completed within twelve (12) months of issuing the approval;

Strathcona Regional District

Applications for Moved or Relocated Buildings and Structures 16. (1) An application for a building permit with respect to a moved or relocated building or structure shall include all the information required in section 13 for standard buildings or section 14 for complex buildings. (2) When an existing building or structure is to be moved or relocated the permit application shall include certification by a registered professional that the building or structure complies with Part 4 of Division B of the Building Code or sections 9.4 and 9.23 in Part 9 of Division B of the Building Code. (3) The application for a permit to move or relocate a building designed for residential occupancy shall include confirmation from a registered professional that the structure complies with Building Code and all other enactments dealing with health and safety.

Note: A building inspector, not reasonably, but technically, could require a home to be stripped to studs and reconstructed with modern framing and furring members based on a bylaw requesting Part 9 compliance. However, this would disregard the intention of the code to not cause hardship financially, to decrease carbon emissions, and would disregard its intentions towards existing homes. It is important to remember the intent of the building code when developing and enforcing bylaws.

Campbell River

PART 14: BUILDING MOVE 14.1 No Person shall move or cause to be moved any building into the City or from one parcel to another in the City without first obtaining a Building Permit to carry out such move and to site the building on the parcel to which it is to be moved. 14.2 An application for a building permit for a building move must be made on the form prescribed by the building official, signed by the owner or agent, and must include (a) certification from a Registered Professional that the structure is safe for its intended use including the structure's new foundation and siting; (b) detailed plans and specifications of the proposed relocation and rehabilitation of the building, including additions and renovations to the building; and (c) detailed plans and specifications of the building siting, driveway and other site improvements proposed on the parcel. 14.3 A security in the form of cash or an irrevocable letter of credit without an expiry date, a certified cheque, or cash payment deposited with the City for the amount equal to five (5) percent of the value of the construction to a maximum of \$10,000.00. 14.4 If the building or part of it is not completed and an occupancy permit has not been issued within a twelve (12) month period subsequent to the issuance of a Building Permit, the Building Official may send a written notice to the owner stating that the building does not comply with this bylaw or other enactment and direct the owner to remedy the non-compliance within thirty (30) days from the date of service of the notice. If the non-compliance is not remedied within the thirty-day period, the City or its agent may enter, tidy and erect screening at the site and the expenses associated with this shall be deducted from the security in section 14.3. 14.5 For clarity other than section 14.2(a) these provisions apply to certified factory built houses that meet or exceed CAN/CSA Z240 MH Series or CSA A-277-M1990. 14.6 Before receiving a building permit for a moved building or structure, the owner must pay to the City the applicable building permit fee set out in Appendix A.

Sayward

24.0 Moved or Relocated Buildings and Structures 24.1 When an existing building or structure is moved or relocated, the building or structure shall be certified, prior to placement on the site, as complying with sections 9.4 and 9.23 of Part 9 or Part 4 of the Building Code. 24.2 When a building that includes, or will include, a residential occupancy, is moved or relocated, the building shall conform to this Bylaw and to sections 9.8, 9.9, 9.10, 9.31, 9.32.4.1 (5) – (7), 9.33.5.2 (1)(b), and 9.34.1.1 of Part 9 of the Building Code.

Note: A building inspector, not reasonably, but technically, could require a home to be stripped to studs and reconstructed with modern framing and furring members based on a bylaw requesting Part 9 compliance. However, this would disregard the intention of the code to not cause hardship financially, to decrease carbon emissions, and would disregard its intentions towards existing homes. It is important to remember the intent of the building code when developing and enforcing bylaws.

Port Hardy

14. Moving Buildings (a) A building may be moved into the District provided: i) the building, when established on its new site shall have a floor area no greater than 372 square metres and shall have a value, in the opinion of the Building Official of not less than Five Hundred and Ninety-two Dollars (\$592.00) per square metre excluding the land on which it stands; and Amended Bylaw 1008-2013 District of Port Hardy Building Bylaw No. 11-2005 - Consolidated 12 ii) the building, and the usage of the building, after being moved, shall conform in all respects with the requirements of this bylaw and all other applicable bylaws of the District. (b) A building situated within the District may be moved within the District provided that the building, when established on its new site, shall have a floor area no greater than 372 square metres and shall have a value, in the opinion of the Building Official of not less than Five Hundred and Ninety-two Dollars (\$592.00) per square metre excluding the land on which it stands.

Note: Bylaws which require a subjective opinion by the Building Official to qualify for relocation are at risk of introducing personal bias to decisions made around community housing.

Port McNeil

12. PERMITS

- 12.1 Every person shall apply for and obtain:
- 12.1.1 a building permit before constructing, repairing, moving, installing or altering a building, structure, sign, change in occupancy or plumbing system;
 - 12.1.2 a demolition permit before demolishing a building or structure.
- 12.2 Applications for the permits noted in 12.1 shall be made in the form prescribed from time to time by the Town of Port McNeill.
- 12.3 A moving permit before moving a building or structure;
- 12.4 A fireplace and chimney permit prior to the construction of a masonry fireplace or the installation of a wood burning appliance or chimney unless the works are encompassed by a valid building permit.
- 12.5 All plans submitted with permit applications shall bear the name and address of the designer of the building or structure.
- 12.6 Each building or structure to be constructed on a site requires a separate building permit and shall be assessed a separate building permit fee based on the value of that building or structure as determined in accordance with Schedule "G" of the current Town of Port McNeill Fee Setting Bylaw.
- 12.7 Every person, making application for a building permit in the Town of Port McNeill, must also make application for an "access permit" to allow for access to a city street or road.
- 12.8 Applications for the permits noted in 12.5 shall be made in the form prescribed from time to time by the Town of Port McNeill.

Gold River

23.0 Moving Buildings 23.1 No person shall move a building or structure into the municipality, or from place to place within the municipality, unless he has a valid and subsisting permit issued by the Building Building Bylaw No. 651, 2005. The fees for such a permit shall be as prescribed and set forth in Appendix "A" attached hereto. 23.2 The Building Official shall not issue a permit as required in subsection 23.1 unless there has been produced a certificate, signed by a registered professional, certifying that the building or structure substantially conforms to the health and

safety aspects of the Building Code in all respects. 23.3 No building or structure may be relocated within the municipality unless it meets the following conditions: (a) it has a value when completed of not less than 100% of the average of all buildings within a 50 metre radius of the lot on which it is to be located; (b) it must be placed on a permanent foundation within three (3) months from the date of issuing the permit; (c) all construction must be completed within twelve (12) months of issuing the permit; (d) the owner must provide cash or letter of credit equivalent to 125% of the value of the work to be performed as a guarantee that the building exterior is completed within twelve (12) months of issuing the permit.

Ucluelet

8.1. Unless exempted by Section 5.2 of this bylaw, a person shall apply for and obtain: (a) a building permit before constructing, repairing or altering a building or Structure; (b) a moving permit before moving a building or Structure; (c) a demolition permit before demolishing a building or Structure; (d) an excavation permit before excavating a site unless the excavation is included in a valid and subsisting building permit; (e) such other permits as this bylaw may require.

Town of Comox

16.Moving Buildings (1) The owner of the parcel on which the proposed building to be moved is located shall pay to the Town of Comox all outstanding utility fees, municipal taxes and applicable interest prior to the issuance of the moving permit. Town of Comox THIS CONSOLIDATED BUILDING BYLAW IS FOR CONVENIENCE PURPOSES ONLY AND SHOULD Bylaw 1472 – Building Bylaw NOT BE USED FOR LEGAL OR INTERPRETIVE PURPOSES WITHOUT REFERENCE TO THE ORIGINAL BYLAW AND AMENDING BYLAWS Updated: November 17, 2021 (2) Every owner or moving contractor to whom a moving permit is issued shall ensure that persons and property are protected from injury and damage during the move. (3) A moving permit shall not be issued until a building permit has been issued in accordance with this bylaw for the relocation of the building to its new location. (#1730 Aug 15/12) (4) The work authorized by the moving permit shall be completed within three months of the permit being issued, or the permit shall expire. (5) The moving permit applicant must pick up an approved moving permit and pay the fee prescribed in Schedule 1 within 30 days of the approval date, or a new application will be required. (6) When a building is raised to accommodate a basement or relocated to another foundation site, the existing chimney or fireplace shall be dismantled and the owner shall obtain a permit for the replacement fireplace or chimney from the building official. (7) The owner shall provide notice of disconnection from municipal water and sewage systems and such disconnections shall be carried out only by the Town of Comox.

Powell River

22.0 MOVING BUILDINGS

22.1 No person shall move or cause any building to be moved into the City or from one location to another in the City without first obtaining a permit in respect of the site to which the building is to be moved.

22.2 Every application for a permit to move a building shall identify the location of the building to be moved and the site to which the building is to be moved.

22.3 No building shall be moved to a site within the City unless the building will comply with the health and safety requirements of the Building Code upon completion of relocation.

22.4 No residential building shall be moved to a parcel within the City unless the building will, after completion of any repairs or alterations required under subsection 22.3 or proposed to be made by the owner and authorized by a permit issued pursuant to this Bylaw, have a value not less than the average value of all residential buildings any portion of which is located within 152 metres (500 ft) of the parcel to which the building is to be moved.

22.5 For the purposes of subsection 22.4, the value of buildings shall be the most recent values fixed by the B.C. Assessment Authority; the value of repairs and alterations shall be determined by the Building Official; and the value of a building after completion of repairs and alterations shall be the sum of its assessed value before being moved and the value of repairs and alterations required under the Building Code and proposed to be made by the owner.

22.6 The owner shall provide to the City certification ensuring that the building or structure is structurally sound, for moving purposes, by a practicing engineer registered in the Province of British Columbia.

Regional District of Nanaimo (and Islands Trust)

18. MOVED ON BUILDINGS

(1) No person shall move or cause to be moved any building into the Regional District or from one parcel to another in the Regional District without first obtaining a Building Permit to carry out such move and to site the building on the parcel to which it is to be moved.

(2) The following information must be provided when applying for a Building Permit for a moved-on building:

(a) Certification from a Registered Professional that the structure is safe for its intended use;

(b) Detailed plans and specifications of the proposed relocation and rehabilitation of

the building;

(c) Detailed plans and specifications of the building siting, parcel landscaping, paving, and other site improvements proposed on the parcel; (d) A report from an accredited appraiser (A.A.C.I.) showing the appraised value of the moved-on building; and,

(e) The building must appraise (as determined by an accredited appraiser (A.A.C.I.) at a value equal to or greater than 100 percent of the average assessed value of the improvements (as determined by the BC Assessment Authority) of the neighbouring developed properties within 100 metres;

(f) Security in the form of a standby irrevocable letter of credit without an expiry date or a certified cheque for an amount equal to five percent of the appraised value to a maximum of \$10,000 as identified in Section 18(2) (d).

Note: There are some municipalities in BC who have similar bylaws in writing, but enforce these bylaws in vastly different ways. This signifies a difference in Building Code interpretation between jurisdictions, and showcases the need to be clear about relocated homes designation as existing buildings, and the intention of local bylaws. (These municipalities are not included in this report to minimize confusion.)

Supporting Documents

NBC and BCBC Relocated Homes

Division A

Notes to Part 1 Compliance

A-1.1.1.1.(1) Application to Existing Buildings. This Code is most often applied to existing or relocated buildings when an owner wishes to rehabilitate a building, change its use, or build an addition, or when an enforcement authority decrees that a building or class of buildings be altered for reasons of public safety. It is not intended that the NBC be used to enforce the retrospective application of new requirements to existing buildings or existing portions of relocated buildings, unless specifically required by local regulations or bylaws. For example, although the NFC could be interpreted to require the installation of fire alarm, standpipe and hose, and automatic sprinkler systems in an existing building for which there were no requirements at the time of construction, it is the intent of the CCBFC that the NFC not be applied in this manner to these buildings unless the authority having jurisdiction has determined that there is an inherent threat to occupant safety and has issued an order to eliminate the unsafe condition, or where substantial changes or additions are being made to an existing building or the occupancy has been changed. (See also Note A-1.1.1.1.(1) of Division A of the NFC.)

Relocated buildings that have been in use in another location for a number of years can be considered as existing buildings, in part, and the same analytical process can be applied as for existing buildings. It should be noted, however, that a change in occupancy may affect some requirements (e.g. loads and fire separations) and relocation to an area with different wind, snow or earthquake loads will require the application of current code requirements. Depending on the construction of the building and the changes in load, structural modifications may be required. Similarly, parts of a relocated or existing building that are reconstructed, such as foundations and basements, or parts being modified are required to be built to current codes.

Whatever the reason, Code application to existing or relocated buildings requires careful consideration of the level of safety needed for that building. This consideration involves an analytical process similar to that required to assess alternative design proposals for new construction. See Clause 1.2.1.1.(1)(b) for information on achieving compliance with the Code using alternative solutions.

In developing Code requirements for new buildings, consideration has been given to the cost they impose on a design in relation to the perceived benefits in terms of safety. The former is definable; the latter difficult to establish on a quantitative basis. In applying the Code requirements to an existing building, the benefits derived are the same as in new buildings. On the other hand, the increased cost of implementing in an existing building a design solution that would normally be intended for a new building may be prohibitive.

The successful application of Code requirements to existing construction becomes a matter of balancing the cost of implementing a requirement with the relative importance of that requirement to the overall Code objectives. The degree to which any particular requirement can be relaxed without affecting the intended level of safety of the Code requires considerable judgment on the part of both the designer and the authority having jurisdiction.

Further information on the application of Code requirements to existing or relocated buildings can be found in the following publications:

- "User's Guide – NBC 1995, Fire Protection, Occupant Safety and Accessibility (Part 3)"
- "Guidelines for Application of Part 3 of the National Building Code of Canada to Existing Buildings"
- Commentary entitled "Application of NBC Part 4 of Division B for the Structural Evaluation and Upgrading of Existing Buildings" of the "Structural Commentaries (User's Guide – NBC 2015: Part 4 of Division B)"
- "User's Guide – NBC 1995, Application of Part 9 to Existing Buildings"
- CBD 230, "Applying Building Codes to Existing Buildings"

These publications can be ordered through NRC's Web site.

These Notes are included for explanatory purposes only and do not form part of the requirements. The number that introduces each Note corresponds to the applicable requirement in this Part.

Provincial Technical Bulletin on Relocated Homes



Information Bulletin
Building and Safety Standards Branch
 PO Box 9844 Stn Prov Govt
 Victoria BC V8W 9T2
 Email: building_safety@gov.bc.ca
 Website: www.gov.bc.ca/buildingcodes

No. B24-07
 April 2, 2024

Relocated Buildings

The purpose of this bulletin is to provide guidance and clarification for a consistent application of the British Columbia Building Code (BCBC, Code) concerning relocating buildings. Relocation of a building as an alternative to demolition can have positive environmental impacts due to its reduction of both demolition waste and the use of new resources.

Although the primary focus of the BCBC is for the design and construction of new buildings, the BCBC also applies to deconstruction and the construction of alterations and additions to existing buildings. Further, the BCBC applies to the work necessary to ensure safety in an existing building that is being relocated to ensure that the building's performance is not decreased below a level that previously existed. An objective of this bulletin is to provide information and direction for such instances so that the BCBC is applied in a manner that does not discourage the relocation of an existing building in favour of demolition, and that authorities having jurisdiction (AHJ) and industry professionals can better understand a reasonable and appropriate application of the BCBC.

A relocated building is considered an existing structure used for supporting or sheltering a use or occupancy that has been physically moved to a different building location¹ (this is different from structures on wheels such as park model trailers). Temporary buildings such as construction site offices, seasonal storage buildings, special events facilities, emergency facilities, and similar structures, designed and intended to be relocated on an ongoing basis, and which the AHJ has exempted from the BCBC, are not within the scope of this bulletin. The Code does not apply to factory-built housing and components that comply with the CSA-Z240 MH Series standard², but the Code does apply to the site preparations, connection to services, and installation of appliances for those houses and components. This bulletin does not discuss compliance with the CSA-Z240 MH Series standard.

This bulletin is strictly limited to clarification of the BCBC's application to the relocation of existing buildings to locations where the BCBC applies³ and is not intended to inform or

¹ An existing building moved to a new location is not considered a new building by the Code.

² There are explicit requirements within the CSA-Z240 MH Series standard that require compliance with enactments in force at the location where the home or components are to be installed. In these circumstances, it is the CSA-Z240 MH Series standard that itself may require compliance with the Code.

³ The BCBC applies to all buildings in B.C. except for the City of Vancouver, Treaty First National that do not reference the BCBC in their agreements, and Federal Lands.

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intervene with valid authorities of local governments or other provincial, territorial, or federal jurisdictions including but not limited to:

- Local government matters related to land use/zoning,
- landscape,
- site access and roadway use,
- original building site demolition/remediation,
- Provincial jurisdiction such as highway use, *Motor Vehicle Act*, *WorkSafeBC*, etcetera,
- Provincial, territorial, or federal enactments (such as other codes and standards).

Although the BCBC references standards for compressed gas and electrical equipment, the Safety Standards Act and its pursuant regulations governs new gas and electrical services, appliances, and equipment, and the modification to services, appliances, and equipment. This bulletin does not discuss permits or other matters under the Safety Standards Act.

The overarching premise of the application of the BCBC to a relocated building is:

- a retroactive application of the current BCBC is not required for a relocated building if the sole reason is due to its relocation,
- the correction of an unsafe condition should one be found to exist, and
- as with any existing building, relocated or not, the current BCBC is applicable to new alterations/additions that occur. However, in some circumstances after sound analysis and good judgment by the designer and local authorities, discretion may need to be applied to a current Code requirement for a realistic and practical application in meeting the Code's intended objective.

The BCBC applies to changes in occupancy and to many design and construction activities including whenever there is an alteration to a building and to any work necessary to ensure safety in a relocated building⁴. Any alteration to an existing building, including alterations associated with relocating an existing building, shall not reduce the level of safety performance below the level that existed prior to relocation⁵. The designer and the AHJ are encouraged to work together to identify the applicable Code requirements and their importance to the Code's objectives. The building's suitability related to occupant loads and environmental loads⁶, such as snow loads and lateral loads (wind and seismic), applicable to the proposed building site, must be considered. Should a building be relocated to a location

⁴ See Sentence 1.1.1.1.(1) of Division A for the full scope of application.

⁵ See Sentence 1.1.1.2.(1) of Division A for the full scope of application to existing buildings. See also Note A-1.1.1.2.(1) which further clarifies the intent and provides a reference to the User's Guide – NBC 1995, Application of Part 9 to Existing Buildings which can be accessed here: <https://nrc-publications.canada.ca/eng/view/fulltext/?id=0a9c1d9d-8211-4576-bc2f-a8881b95210c>.

⁶ Environmental loads are determined by the AHJ, or alternatively found in Appendix C of Division B.

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with higher environmental loads than the building was originally designed to, structural upgrades will be required.

Alteration

Alterations include changes and extensions (additions) to any matter or thing related to an existing building. A new foundation at a new location is considered new construction, and anchorage of a relocated building to that new foundation will likely result in some changes to the existing building. (The design and construction requirements for the new foundation include providing for appropriate soil bearing capacity, perimeter drainage, insulation, etcetera.) Alterations related to the relocation of a building should be considered in a similar context to alterations to existing buildings generally.

Unsafe condition

The Code's application focusses on matters of safety which include building provisions such as structural design, fire protection, and occupant life safety. The siting of the relocated building on its new site would need to comply with the Code's spatial separation requirements for the type of construction of the exposing building face. The unique features and exposing building face of the existing building being relocated determine the limiting distance needed to protect adjacent buildings at the new location. The Code uses the term 'unsafe condition' to apply to potential hazards to a person's health as well as safety. Should a relocated residential building be installed with a new attached storage garage, current Code requirements for carbon monoxide detection will be required to mitigate the potential unsafe condition.

Work necessary to ensure safety

The application of the BCBC to a relocated building requires consultation and coordination between the AHJ and the owner to determine the appropriate level of safety performance for the existing building based on its conditions at the original location, and what improvements are necessary to meet current safety requirements of the BCBC at the new location. It is highly recommended an assessment / survey of the building proposed to be relocated be provided by a competent person to assist in facilitating the discussions. Generally, this primarily applies to any parts of the building that are directly being affected by the process of relocation, along with critical elements that affect the life-safety of the building at the new location. It is of course ideal to identify barriers to moving a building to a desired location before deconstruction and construction activities begin.

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Frequently Asked Questions (FAQs)

Does the BCBC permit homes built to the CSA Z240 MH Series of standards to be moved?

Yes, the BCBC anticipates homes built to the CSA MH Series of standards to be moved to one or more locations over their lifespan. These homes have a nameplate with information as to their design specifications and the structural loads they can withstand, and this helps determine what locations and conditions these homes are suitable for. The BCBC regulates the site preparations (siting, foundations, mountings) and the connections to services and installation of appliances for these homes. Local enactments such as building and zoning/land use bylaws may also apply. This bulletin does not discuss compliance, certification, or alterations to homes built to the CSA MH Series of standards.

Work with the local AHJ and use the [Manufactured Home Registry](#) when planning to move a home, whether new or existing, that is built to the CSA Z240 MH Series of standards.

When I move a building, do I follow the edition of the code it was originally designed to for installation at the new location?

No. In some cases, existing buildings could have been built before the first Provincial Codes were adopted. Any alterations that are required as part of the relocation of an existing building to a new location must conform to the edition of the BCBC in force at the time they occur, meaning those aspects of the building that are changing or reconstructed as part of a relocation today must conform to the edition currently in force. Alterations shall not decrease the level of building performance that existed prior to the alterations.

What happens if I move a building that has had work done without permits and doesn't meet Code?

While it is anticipated that not all aspects of existing buildings will meet current Code requirements, an assessment of existing building's performance is critical for determining how it will perform at a new location. Work done without permits may be more difficult to assess and work that does not meet the minimum requirements of the Code can pose undue risk to health and safety. Work with the local AHJ to develop a plan for what work will be required as part of a relocation and whether an unsafe condition exists.

Can local authorities have enactments and other rules for what types of building can be moved into their jurisdiction?

Yes, work with the local AHJ when planning to move a building into their jurisdiction and follow local building requirements.

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Sample of Letters of Support for Home Relocation in BC and Canada



April 30th, 2024

To the Canadian Board for Harmonized Construction Codes,

I am writing to you to appeal for Building Code recommendations for relocated homes being moved into the body of the Code, rather than remaining in Appendices, as outlined in CCR 2102.

Additionally, we urge you to consider representation of the relocated home industry on the Standing Committee on Housing and Small Buildings (HSB) and the Standing Committee on Energy Efficiency (EE). Relocated home regulations have not been updated since 1995, and we are now in a time where Canadian municipalities are becoming more supportive of home relocation as demolitions and affordability become ever-larger challenges to navigate. The waste diversion, embodied carbon preservation and low cost of relocated homes offer a way to address both of these concerns in one action, if the Federal government steps up to provide guidance for Provinces and local jurisdictions to model. We know some Provinces are requesting changes that would work well in tandem with relocated home applications, such as BC's Alternate Compliance Methods for Heritage Buildings in BCBC Table 1.1.1.1.(5) which they hope to see adopted Federally. Likewise, for new building, Provinces in central Canada are cutting down on costs and materials via factory-built homes, without sacrificing quality. These homes are stick-built homes (not modular), constructed on a central site, that are relocated to their new owners after construction is completed (see examples at <https://www.sk2customhomes.com/>). This practice provides homes of superior quality and longevity than the modular factory-built homes for which the government is currently providing relaxations. Further, relocated homes are being recognized as a readily-available resource for Indigenous communities, who are in favor of climate-friendly building alternatives. Ensuring these communities continue to have choices around housing options, upgrades and upgrade timelines within building code allows for grants to be applied over multiple years, and that they retain autonomy over the housing they choose for their families and their land. Relocated homes can provide obvious and enormous opportunities via reuse of existing buildings and factory-construction of new buildings, but local departments are in immediate need of clarity within the NBC in interpreting and applying the building code to relocated buildings. Good homes are being unnecessarily demolished and lost from our housing stock while other numerous affordable, relocated homes are being held up in permitting - wasting time, money and resources for both municipal departments and developers. In many cases these delays are leaving Canadian families homeless as they wait for approval. I urge you to recognize the importance of the CBHCC's engagement in this issue. This change would help clarify a Code mandate which already exists, and strengthen the CBHCC's position in providing consistency, guidance and continued education to Canadians.

Sincerely,

Sue Maxwell

Chair, Zero Waste British Columbia



604 885 1986
PO Box 129, 5797 Cowrie St,
2nd Floor
Sechelt, BC V0N 3A0
www.sechelt.ca

March 8, 2024

Minister Ravi Kahlon
Ministry of Housing
By email: hous.minister@gov.bc.ca

Re: Letter of Support be issued to Advocate for the Province to provide clarification on their regulations with respect to the relocation of homes

To The Honourable Ravi Kahlon,

I am writing to you with a request for clarification regarding the application of the BC Building Code to relocated homes.

Municipalities need clarity from the province for interpreting and applying the building code with respect to relocated buildings. Relocating existing housing can be a means of diverting demolition waste that cannot be reused or recycled from the landfills.

We look forward to clarification on how the Building Code should be applied to relocated buildings as we continue to provide consistency and guidance to our community members.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Poulsen', with a long horizontal flourish extending to the right.

Kerianne Poulsen
Corporate Officer
kpoulsen@sechelt.ca



May 3rd, 2024

To the Canadian Board for Harmonized Construction Codes,

I am writing to advocate for the integration of comprehensive embodied carbon and circular economy policies into the Building Code. These policies are crucial for significantly reducing waste and greenhouse gas emissions in the construction sector. As we address the challenges of sustainability and environmental impact, it is essential that our Building Code reflects these priorities directly within its main provisions, rather than relegating them to the Appendices as seen in current practices, such as outlined in CCR 2102.

While the benefits of relocated homes, such as waste diversion, preservation of embodied carbon, and cost efficiency, align with these objectives, I urge a broader application of sustainable building practices across all types of construction and renovation projects. This approach will not only enhance our environmental stewardship but also improve housing affordability and quality across Canada.

In addition, representation from industries focused on sustainable building practices on the Standing Committee on Housing and Small Buildings (HSB) and the Standing Committee on Energy Efficiency (EE) would enrich the discussions and development of more robust environmental policies. Such representation could ensure that innovative practices, like those developed in British Columbia for heritage buildings or the stick-built homes constructed centrally for relocation in central Canada, receive the consideration they deserve at a national level.

These measures will also support Indigenous communities who are actively seeking sustainable and autonomous housing solutions, aligning with both environmental goals and the cultural significance of housing.

I strongly encourage the CBHCC to adopt a proactive stance in incorporating these sustainable practices into the National Building Code. Doing so would clarify and strengthen the Code's mandate, enhance consistency, and expand educational outreach, ultimately fostering a more sustainable and efficient construction industry in Canada.

Thank you for considering this pivotal shift in our building standards. I look forward to seeing our building codes evolve to meet the modern demands of environmental sustainability and operational efficiency.

Sincerely,

Elisabeth Baudinaud
Founder and Principal
Carbon Wise

May 3, 2024

To the Canadian Board for Harmonized Construction Codes,

I am writing to you to appeal for Building Code recommendations for relocated homes being moved into the body of the Code, rather than remaining in Appendices, as outlined in CCR 2102.

Additionally, we urge you to consider representation of the relocated home industry on the Standing Committee on Housing and Small Buildings (HSB) and the Standing Committee on Energy Efficiency (EE). Relocated home regulations have not been updated since 1995, and we are now in a time where Canadian municipalities are becoming more supportive of home relocation as demolitions and affordability become ever-larger challenges to navigate. The waste diversion, embodied carbon preservation and low cost of relocated homes offer a way to address both of these concerns in one action, if the Federal government steps up to provide guidance for Provinces and local jurisdictions to model. We know some Provinces are requesting changes that would work well in tandem with relocated home applications, such as BC's Alternate Compliance Methods for Heritage Buildings in BCBC Table 1.1.1.1.(5) which they hope to see adopted Federally.

Likewise, for new building, Provinces in central Canada are cutting down on costs and materials via factory-built homes, without sacrificing quality. These homes are stick-built homes (not modular), constructed on a central site, that are relocated to their new owners after construction is completed. (I.e. <https://www.sk2customhomes.com/>). This practice provides homes of superior quality and longevity than the modular factory-built homes that the government is currently providing relaxations for.

Further, relocated homes are being recognized as a readily-available resource for Indigenous communities, who are in favor of climate-friendly building alternatives. Ensuring these communities continue to have choices around housing options, upgrades and upgrade timelines within building code allows for grants to be applied over multiple years, and that they retain autonomy over the housing they choose for their families and their land.

Relocated homes can provide obvious and enormous opportunities via reuse of existing buildings and factory-construction of new buildings, but local departments are in immediate need of clarity within the NBC in interpreting and applying the building code to relocated buildings. Good homes are being unnecessarily demolished and lost from our housing stock while other numerous affordable, relocated homes are being held up in permitting; wasting time, money and resources for both Municipal departments and developers. In many cases these delays are leaving Canadian families homeless as they wait for approval.

I urge you to recognize the importance of the CBHCC's engagement in this issue. This change would help clarify a Code mandate which already exists, and strengthen the CBHCC's position in providing consistency, guidance and continued education to Canadians.

Sincerely,



Stephanie Mah, CAHP
Creative Director, Gaiimo
Past-President, Architectural Conservancy of Ontario - Toronto Branch
Ontario, Canada

Acknowledgements

These recommendations include policy outlines taken directly from the Municipal Action Plan developed by Nickel Bros, Lighthouse Sustainability Society, and Renewal Development. Others have been updated from that document to eliminate redundancies created by Provincial legislation released since the Municipal Action Plan was published, or further amended or additionally created based on feedback from members of the BC Structural Movers' Association.

Thank you to Mayor and Council of the City of Courtenay for this opportunity to contribute to carbon reduction and affordable housing in their community.