



**Ontario**  
Home Builders'  
Association

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Building and Development Branch  
Ministry of Municipal Affairs and Housing  
College Park 12th Floor, 777 Bay St, Toronto, ON M7A 2J3

**Proposal Number: 22-MMAH016**

**RE: Proposed Building Code Changes to Support More Homes Built Faster Ontario's Housing Supply Action Plan 2022-2023 (Phase 3 - Fall 2022 Consultation for the Next Edition of Ontario's Building Code)**

**The Ontario Home Builders' Association (OHBA)**

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, developers, professional renovators, trade contractors and many others within the residential construction sector.

The OHBA is coordinating our public policy response with regards to Bill 23, the More Homes Built Faster Act, 2022 with input from members across Ontario. OHBA is proudly affiliated with the Building Industry and Land Development Association (BILD), the West End Home Builders' Association (WEHBA) and the Greater Ottawa Home Builders' Association (GOHBA).

Changes to Ontario's Building Code have a significant impact on the residential construction industry and ultimately the construction of new homes and housing attainability. OHBA supports technical alignments that allow for practical building standards which both ensure Ontario can continue to build safe homes, while not negatively impacting attainability at a time when the costs of construction continue to rise. Furthermore, OHBA strongly supports the principle that Ontario specific standards, particularly those which industry are highly familiar with and support, take precedent over any proposed National Building Code (NBC) changes as the process of code harmonization is underway. This will help ensure continuity in the residential construction sector and mean more stability for builders who rely on a predictable building code system to design and construct homes.

There are a number of general code changes which OHBA can support that will provide more flexibility in mid-rise wood buildings between four and six storeys and remove the current requirement for a standpipe system in a four-storey stacked townhouse. These are prudent changes that will ensure the practical construction of safe homes. Moreover, it should be noted that the mid-rise building code change proposals from this consultation were items added when mid rise wood frame construction was first adopted years ago in Ontario to make these buildings safer than what was permitted by the national building code at the time. The changes being proposed respond to the practical constructability needs in Ontario while ensuring dwellings are safe and efficient.

We thank the Ministry for the opportunity to comment on these proposals. We also recognize that there is still more work to do and OHBA may provide further comments at a later date. We look forward to continuing engaging with the Ministry in order to ensure these proposals are aligned with the goal of increasing housing attainability.