



Islands Trust

# Tiny Homes on Wheels Enablement Project FINAL REPORT



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## **Acknowledgement**

As the Principal of Simon Reid Consulting, I respectfully acknowledge that this report was prepared on the traditional territories of the Snuneymuxw First Nation, the Stz'uminus First Nation, and the Snaw-naw-as (Nanoose First Nation), encompassing the areas around Departure Bay and Downtown Nanaimo. I honor the Treaty of 1854 and express my gratitude for the Snuneymuxw people's enduring wisdom and stewardship of this land. I further acknowledge their generosity in welcoming settlers, and recognize the profound impact of subsequent actions that have disrupted their communities and ways of life. I remain committed to learning from and respecting the ongoing relationship between the Snuneymuxw, Stz'uminus and Snaw-naw-as Nations and their ancestral lands.

I offer this report with deep respect and gratitude.

- Simon Reid

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## 1. Executive Summary

The *Tiny Homes on Wheels (THOWs) Enablement Project* was initiated by the Islands Trust and developed in collaboration with the Regional District of Nanaimo (RDN) to address the growing interest in, and challenges surrounding, the integration of THOWs as a viable housing option.

The Islands Trust was established by the Province of British Columbia in 1974, through the Islands Trust Act. The Islands Trust operates with 12 Local Trust Committees who are responsible for maintaining and updating official community plans and land use bylaws. Adjacent regional districts have responsibilities for services such as parks, solid waste and recycling, utilities and - most importantly for this project - building inspection and permitting.

Recognizing the existing regulatory ambiguity and the potential of THOWs to contribute to affordable housing solutions, this project aimed to develop a regulatory framework that facilitates their responsible development and integration into the Islands Trust Area. While the research and findings in this report are focused on the Trust Area, the information contained herein is relevant to other jurisdictions.

The core objectives of the project were to develop a clear regulatory framework, establish appropriate building standards and inspection protocols, address planning and siting considerations, explore alternative designations for THOWs, and provide recommendations for addressing insurance and servicing challenges.

The project employed a multi-faceted approach, combining research, analysis, and expert consultation. A key component was the Technical Panel Workshop, held on March 12, 2025 in Nanaimo, which brought together experts to clarify the regulatory landscape and develop actionable recommendations.

A significant challenge identified was the typical designation of THOWs as Recreational Vehicles (RVs) under CSA standards (Z240RV and Z241). This designation fails to recognize THOWs as potential permanent dwellings, leading to regulatory ambiguity and limitations on occupancy. The project recommends developing a distinct THOWs designation, aligning construction standards with CSA Z240MH and the intent of the BC Building Code (securing the dwelling to a foundation), and implementing standardized inspection protocols.

This report addressed critical aspects of Tiny Homes on Wheels, including planning and siting, wastewater solutions, insurance challenges, and affordability. Key recommendations include amending zoning bylaws, establishing servicing standards, promoting public education, enabling specialized insurance policies, and further researching THOWs' potential in addressing the housing affordability crisis.



A Regulatory Framework Roadmap was created, outlining prioritized recommendations and actionable implementation steps, emphasizing the formation of a cross-functional THOWs Implementation Working Group and the drafting of templated bylaws that can be customized by local governments. Future research should focus on affordability, economic impacts, sustainability, social equity, financing, and community integration.

The recommendations presented in this report provide a clear pathway for the Islands Trust and the RDN to address the challenges and opportunities associated with THOWs, contributing to housing affordability, diversity, and sustainability within the region.

Key recommendations include:

1. Developing a new designation for THOWs, distinct from RVs.
2. Amending zoning bylaws to explicitly permit THOWs.
3. Establishing THOWs construction standards aligned with CSA Z240MH and the BC Building Code.
4. Implementing standardized inspection protocols.
5. Developing clear servicing standards.
6. Addressing insurance challenges through enabling specialized policies and third-party certifications.
7. Creating templated bylaws and planning guidelines.
8. Promoting public education and engagement.
9. Exploring alternative wastewater and “off grid” solutions.
10. Providing education for building officials.

The project concludes that the responsible integration of THOWs requires an ongoing, collaborative approach involving local governments, industry professionals, and community members. This multi-disciplinary approach is crucial to the success of the next phases of work.

This project represents a significant step towards the responsible enablement of THOWs, providing a framework for local governments to address the growing demand for more affordable housing solutions while ensuring the safety and well-being of their communities.

## 2. Introduction

### 2.1 Project Background and Purpose

The THOWs Enablement Project was initiated to address the growing interest in, and regulatory challenges surrounding, the integration of THOWs as a viable housing option within the Islands Trust Area, while engaging the broader Regional District of Nanaimo (RDN). Recognizing the existing regulatory ambiguity and the potential of THOWs to contribute to affordable housing solutions, the Islands Trust and the RDN embarked on a collaborative effort to develop a comprehensive regulatory framework.

The project stemmed from the acknowledgment that current building codes, zoning bylaws, and servicing standards are primarily designed for conventional, foundation-based dwellings, leaving THOWs in a precarious regulatory limbo. Typically designated as Recreational Vehicles (RVs) under CSA standards (Z240RV/Z241), THOWs face limitations on occupancy and struggle to meet the requirements for permanent residency.

To guide this project, a Steering Committee (Appendix A) was established, comprising representatives from diverse jurisdictions:

- Islands Trust:
  - Mairead Boland (Chair, Saturna Island Local Trustee)
  - Laura Patrick (Salt Spring Island Local Trustee)
  - Tobi Elliott (Gabriola Island Local Trustee)
  - Aaron Campbell (North Pender Island Local Trustee)
- Regional District of Nanaimo (RDN):
  - Vanessa Craig (Electoral Area Director, Area B).
- Capital Regional District (CRD):
  - Paul Brent (Southern Gulf Islands Electoral Area Director).
- Strathcona Regional District (SRD):
  - Mark Vonesch (Electoral Area Director, Area B - Cortes Island).
- Regional District of Okanagan-Similkameen (RDOS):
  - Adrienne Fedrigo (Electoral Area Director and Chair of Tiny Home Builder's Association).

Guided by the Steering Committee Terms of Reference (Appendix B), this committee provided strategic oversight and direction, ensuring alignment with the strategic goals of participating organizations. The diverse composition of the Steering Committee reflects the broad interest in this project and the hope that its outcomes would have a much wider reach beyond the Islands Trust Area.

The project's primary purpose is to enable the responsible integration of THOWs as a legitimate, sustainable, and affordable housing option. This includes exploring alternative

designations, establishing building standards, developing inspection protocols, and amending planning regulations to accommodate THOWs.

## 2.2 Islands Trust Context

The Islands Trust was established by the Province of British Columbia in 1974, through the Islands Trust Act. The Islands Trust operates with 12 Local Trust Committees who are responsible for maintaining and updating official community plans and land use bylaws. Regional districts have responsibilities for services such as parks, solid waste and recycling, utilities and - most importantly for this project - building inspection and permitting.

The Islands Trust Area (Figure 1), characterized by its unique island communities and commitment to preserving ecological integrity, faces distinct housing challenges. The region's diverse landscapes, limited infrastructure, and growing population necessitate innovative housing solutions that balance environmental sustainability with community needs. The Islands Trust Housing Strategic Action Plan (January 2024) underscored the urgency of addressing housing affordability and diversity.

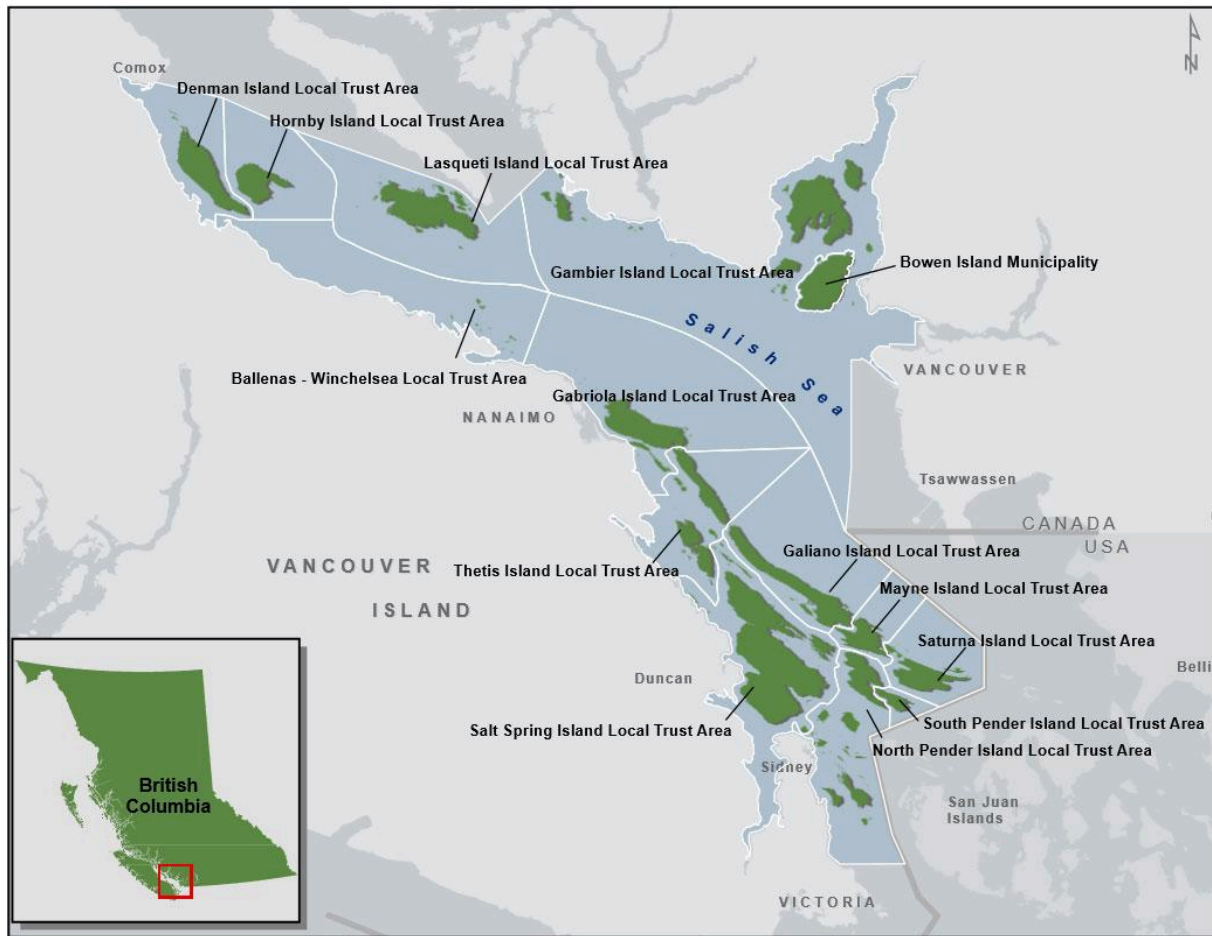


Figure 1: "The Islands Trust Area" (source: <https://islandstrust.bc.ca/about-us/overview-of-islands-trust/>)

The context of the Islands Trust necessitates a regulatory approach that is sensitive to the region's environmental and social fabric. Any proposed framework must consider the ecological footprint of THOWs, the availability of servicing infrastructure, and the potential impacts on community character. Given the varying bylaws and community needs across the Islands Trust Area, the project aims to provide flexible, adaptable guidelines that can be tailored to local contexts.

## 2.3 Project Objectives and Scope

The core objectives of the THOWs Enablement Project are to:

1. Analyse the current THOWs building standards landscape.
2. Develop a clear and consistent regulatory framework for THOWs.
3. Establish appropriate building standards and inspection protocols.
4. Identify and address planning and siting considerations.
5. Explore alternative designations for THOWs beyond RVs.
6. Provide recommendations for addressing insurance and servicing challenges.

The scope of the project encompasses an analysis of existing regulations, a review of best practices, and the development of actionable recommendations. It focuses on THOWs as a distinct housing type, acknowledging their unique characteristics and requirements. The project aims to create a regulatory roadmap that facilitates the responsible development of THOWs as both primary and secondary dwellings.

## 2.4 Methodology

The methodology employed in this project involved a multi-faceted approach, combining research, analysis, and expert consultation. Key components of the methodology included:

- Regulatory Review: An in-depth analysis of current building standards (Appendix C), zoning bylaws, and servicing standards at the provincial and local levels.
- Technical Panel Workshop: A crucial component of the project was the Technical Panel Workshop held on March 12, 2025, in Nanaimo. This workshop convened a diverse and multidisciplinary group of experts, including:
  - Building code specialists
  - Land use planners
  - Construction professionals
  - Connected services experts (utilities, waste management)

This diverse composition ensured a comprehensive review of the regulatory landscape and the development of practical, implementable recommendations.

Guided by the Technical Panel Charter (Appendix E), the workshop aimed to:

- Clarify the current regulatory landscape.
- Identify key challenges and opportunities for THOWs development.

- Develop actionable recommendations for enabling the development of THOWs.
- Create a roadmap for implementation of the recommendations.
- Stakeholder Engagement: Communication and consultation with stakeholders, including local government staff, industry professionals, and adjacent organizational bodies (such as Small Housing BC).
- Report Development: The compilation of findings and recommendations into a comprehensive final report.

The Technical Panel Workshop, driven by a comprehensive agenda (Appendix F), served as a critical platform for collaborative problem-solving and knowledge sharing. The workshop's outcomes, as detailed in the workshop minutes (Appendix G), have been instrumental in shaping the recommendations presented in this report.

### 3. Defining Tiny Homes on Wheels (THOWs)

#### 3.1 Current Definitions and Designations

For the purposes of this project, THOWs are defined as small, moveable, permanent dwellings built on a trailer chassis. This simple definition is based on the BC Housing definition of “...a tiny house as: a ground-oriented permanent dwelling that is detached, moveable and non-motorized, small in size (less than 500 square feet) and using a compact design.”<sup>1</sup> but does not get involved in stipulating square footage limits so as not to complicate planning and zoning considerations within the Trust Area or limit construction designs that are rapidly evolving in the THOWs industry.

The absence of a standardized definition creates regulatory challenges. Currently, THOWs are typically designated as Recreational Vehicles (RVs) under CSA standards (Z240RV/Z241), which are designed for temporary recreational use, not permanent residences. This designation leads to occupancy limitations and conflicts with zoning bylaws and building codes designed for traditional dwellings. Alternatively, some builders use the CSA A277 standard for modular homes, which aligns better with the BC Building Code, but lacks formal recognition for THOWs. The lack of international standards and conflicting industry definitions (e.g., ASTM's 400 sq ft limit) further complicates matters, hindering the development of clear regulations.

#### 3.2 Overview of the Existing Regulatory Landscape

The regulatory landscape for THOWs is fragmented, involving provincial and local regulations. At the provincial level, the BC Building Code, Motor Vehicle Act, and Technical Safety BC's electrical safety regulations apply. Locally, zoning bylaws (often with minimum square footage requirements), servicing standards, and Islands Trust/RDN bylaws impact THOWs. Relevant CSA standards include Z240RV (RVs) and Z241 (park trailers), Z240MH (manufactured homes), and A277 (modular homes). Health authority regulations address water and sewage. The variability of local regulations necessitates a flexible, yet consistent, regulatory approach.

#### 3.3 Key Challenges and Issues

The current regulatory landscape presents several challenges:

- Regulatory Ambiguity: Need for clear designation of THOWs vs. RVs.
- Building Code Discrepancies: Conflicts between RV standards and BC Building Code.
- Zoning Restrictions: Minimum size requirements for THOWs and RV parking limitations.
- Inspection Gaps: Absence of standardized THOWs inspection protocols.
- Insurance Challenges: Insurer uncertainty due to mobile designation.



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- Utility Hookups: Infrastructural challenges for connecting to services.
- Community Acceptance: Resistance due to property value and "nuisance" concerns.
- Affordability: Maintaining THOWs affordability under regulations.
- Environmental Sustainability: Energy efficiency and responsible waste management.
- Site-Built Tiny Home Inspection: Difficulty for local governments.

Addressing these issues requires a collaborative effort to develop a clear, consistent, and adaptable regulatory framework.

## 4. Building Standards and Inspection Protocols

### 4.1 Comparison of Existing Standards (CSA, BC Building Code)

The divergence between existing standards for RVs and permanent dwellings presents a significant challenge for the integration of THOWs. Here's a comparative overview:

Feature	CSA Z240/Z241 (RVs/Park Trailer Mobile Homes)	CSA Z240MH (Manufactured Moveable Homes)	CSA A277 (Modular Homes)	BC Building Code (Permanent Dwellings)
Purpose	Temporary recreational use	Permanent or semi-permanent residential use, designed for wheeled transport	Modular, pre-fabricated homes	Permanent residential structures
Structural Integrity	Designed for mobility; less stringent requirements for occupancy	Designed for transport and permanent occupancy; more stringent than RVs	Designed to meet BC building code, and be transportable	Rigorous requirements for foundations, walls, roofs, and floors to withstand loads
Insulation & Energy Efficiency	Minimal insulation; limited energy efficiency considerations	Moderate insulation, designed for permanent occupancy	Higher than RV's, but variable.	Stringent requirements for insulation, air tightness, and energy-efficient systems
Plumbing & Electrical	Mobile systems; may not meet residential code requirements	Meets residential codes, but may have specialized connections	Meets residential codes, but may have specialized connections	Comprehensive standards for potable water, wastewater disposal, and electrical safety
Fire Safety	Basic fire safety measures; may lack adequate fire separation and egress	Meets residential codes, with some adaptations for transport	Meets residential codes, but may have specialized systems	Strict requirements for fire separation, smoke alarms, egress, and fire-resistant materials
Ventilation	Limited ventilation; may not meet indoor air quality standards	Meets residential codes, with some adaptations for transport	Meets residential codes, but may have specialized systems	Comprehensive ventilation requirements for indoor air quality and moisture control

Inspection	Focus on vehicle safety; limited inspection of residential systems	Factory and third-party inspection, with some local government oversight	Third party inspection, and local government permits	Multi-stage inspections by local building officials
Foundation Requirements	No foundation requirements; designed for mobility	Requires foundation per manufacturer's specifications and local government permit	Requires foundation per local government permit	Mandatory foundation requirements based on soil conditions and structural loads
Loft and Staircase Requirements	May use ladders	Must have code-compliant staircases	Must have code compliant staircases	Must have code compliant staircases

A more thorough examination of the current building codes that impact THOWs can be found in Appendix C.

## 4.2 Analysis of Current Inspection Gaps

The current inspection landscape for THOWs is characterized by significant gaps and inconsistencies. Key issues include:

- **Lack of Standardized Protocols:** There is no standardized inspection protocol specifically designed for THOWs. This leads to variations in inspection practices and uncertainty for THOWs builders, residents, financiers and insurers.
- **Focus on RV Standards:** Inspections often focus on RV standards (CSA Z240RV/Z241), which do not adequately address the permanent residential aspects of THOWs.
- **Foundation and Servicing:** The inspection of foundation connections and utility hookups (water, sewer, electrical) is often overlooked or inconsistently applied.
- **Third-Party Certification:** While third-party certifications like Intertek and QAI ensure compliance with CSA standards, they do not replace the need for local government inspections of site-specific installations.
- **Site-Built THOWs:** Site-built THOWs pose a unique challenge, as they lack the standardized construction and certification processes of factory-built THOWs.
- **NOAH Certification:** NOAH certification is viewed as problematic by RDN inspection services due to a lack of compliance with Canadian Standards (see Appendix H).
- **Misinformation:** There is a lack of clear and consistent information available to building officials regarding THOWs construction and inspection.

These inspection gaps create challenges for regulatory compliance and hinder the responsible development of THOWs.

## 4.3 Technical Panel Recommendations

### 4.3.1 Proposed THOWs Construction Standards

Based on the Technical Panel Workshop and the analysis of existing standards, the following recommendations are proposed for THOWs building standards:

1. Alignment with CSA Z240MH and BC Building Code: THOWs should at least be built to CSA Z240MH standards, with an emphasis on meeting the intent of the BC Building Code.
2. Foundation Requirements: THOWs intended for permanent occupancy should be affixed to foundations to ensure stability and compliance. It should be noted that a foundation, in the context of THOWs, refers to temporary foundation methods that prioritize reversibility, minimizing disturbance to the existing landscape. Methods for affixing to a foundation, as outlined by the Technical Panel, include welding or bolting to helical piles, blocking and lashing to securing points, and other special fasteners. Specifically, these methods for affixing to a temporary foundation involve surface-mounted foundation systems that avoid the need for extensive excavation or grading. Ultimately, THOWs require engineered, removable foundation systems designed for temporary placement, offering flexibility and minimal site impact. This helps meet inspection protocols and enables, but doesn't guarantee, financing and insurability.
3. Utility Connections: THOWs should be equipped with standardized utility connections (water, sewer, electrical) that meet local servicing standards.
4. Egress and Staircases: THOWs must have code compliant staircases and egress.
5. Third-Party Certification: THOWs should ideally undergo third-party certification by recognized organizations like Intertek or QAI to ensure compliance with CSA standards.
6. Clear Distinction: A clear regulatory distinction must be made between THOWs and Recreational Vehicles.
7. Self-Builders: Self-builders of THOWs must adhere to the same CSA Z240MH standard and undergo documentation and inspection processes (including obtaining a building permit prior to construction commencement).

### 4.3.2 Recommended Inspection Processes

To address the current inspection gaps, the following inspection processes are recommended:

1. Standardized Inspection Checklist: Develop a standardized inspection checklist for THOWs, covering all aspects of construction, foundation, and servicing. This checklist would be owned by the local area inspection department.



2. Multi-Stage Inspections: Implement multi-stage inspections, including pre-foundation, framing, plumbing, electrical, and final inspections, unless otherwise provided by a third-party inspection service.
3. Foundation Inspection: Require a structural engineer's report verifying the foundation's compliance with the CSA Z240MH standard.
4. Utility Connection Inspections: Conduct inspections of utility connections to ensure compliance with servicing standards.
5. Education and Training: Provide education and training to building officials on THOWs construction and inspection processes.
6. Pre-Approved Plans: Explore the development of pre-approved THOWs plans to streamline the inspection process.
7. Collaboration: Foster collaboration between local building departments and third-party certification organizations.
8. Site Built Homes: Site built homes will have to have photo documentation of every stage of the build, if not inspected on-site, or will not be able to be approved for occupancy by local inspection departments.

By implementing these recommendations, local governments can ensure the safety and compliance of THOWs, while also facilitating their integration as a viable housing option.

## **5. Planning and Siting Considerations**

### **5.1 Review of Current Local Government Planning Challenges**

Integrating Tiny Homes on Wheels (THOWs) into municipal planning is challenging due to zoning bylaws and development regulations designed for traditional dwellings. Minimum square footage requirements and RV designations exclude THOWs from permanent housing options. The lack of THOWs-specific provisions creates regulatory uncertainty. Density and lot siting restrictions, along with community resistance based on property value and "nuisance" concerns, further complicate integration. Amending Official Community Plans (OCPs) is also necessary for zoning bylaw changes, adding another layer of complexity.

### **5.2 Best Practices for THOWs Integration**

Successful THOWs integration requires proactive strategies. Zoning bylaws must be amended to explicitly permit THOWs in designated areas, with clear guidelines for placement, occupancy, and servicing. Consistent THOWs designation, distinct from RVs, is essential. Flexible regulations accommodating THOWs design variations, while ensuring safety and servicing, are needed. Designating areas for THOWs communities or parks with shared amenities is beneficial. Public education and pilot projects can address community concerns. Alternative strategies like density swaps should be explored. Templated bylaws that can be customized by local governments, including THOWs designations, will aid local trust committees.

### **5.3 Infrastructure and Servicing Requirements (Water, Sewer, Electrical)**

Adequate infrastructure and servicing are crucial for THOWs integration. This includes safe potable water connections (municipal or approved wells), approved sewage disposal (septic or municipal), and code-compliant electrical hookups. Clear standards for utility connections, ensuring permanence and safety, are essential. Transparent inspection and approval processes are needed for builders', owners' and insurers' benefits. Effective waste management solutions for THOWs communities are critical. Compliance with local health authority regulations for water and sewage is mandatory, while enabling innovative solutions, such as bulk water purchases, is important collaborative work between local governments and local health authorities. Engaging Registered Onsite Wastewater Professionals for wastewater system design and innovation is recommended. Backflow preventers are required for rainwater/city water systems.

## 5.4 Technical Panel Recommendations

### 5.4.1 Zoning Options for THOWs

The Technical Panel recommended exploring various zoning options for THOWs, including:

1. Primary Dwellings: Allow THOWs as primary dwellings in designated residential zones, subject to compliance with building codes and servicing standards.
2. Secondary Dwellings: Permit THOWs as secondary dwellings or accessory dwelling units (ADUs) on existing residential lots.
3. THOWs Parks: Establish dedicated THOWs parks or communities with shared amenities and infrastructure.
4. Interim Temporary Permits: Utilize temporary use permits as a provisional solution while working towards full bylaw compliance.

### 5.4.2 Planning Tools and Guidelines

To facilitate THOWs integration, the Technical Panel recommended developing the following planning tools and guidelines:

1. Templated Bylaws: Develop templated bylaws, that can be customized by local governments, that include clear definitions and regulations for THOWs.
2. Planning Guidelines: Create planning guidelines that address siting considerations, servicing requirements, and community integration.
3. Flexible Regulations: Develop flexible regulations related to density and lot size, allowing for the integration of THOWs in various contexts.
4. Public Education: Develop public education materials to address community concerns and promote understanding of THOWs.
5. Owner Checklists: Provide checklists to aid potential THOWs owners with the requirements of local governments.
6. Building Official Education: Provide education for building officials, to inform them of the differences between RVs and THOWs.

## **6. Regulatory Designations, Servicing and Insurance**

### **6.1 Exploring Alternative THOWs Designations**

The typical designation of THOWs as RVs presents a significant regulatory hurdle. This designation, based on CSA standards (Z240RV/Z241), fails to capture the essence of THOWs as potential permanent dwellings. It leads to limitations on occupancy periods, hinders access to conventional financing and home insurance, and creates ambiguity in zoning and building code applications. Therefore, exploring alternative designations is crucial for the responsible integration of THOWs.

A more suitable designation would recognize the unique characteristics of THOWs as small, moveable residential structures that can meet building code standards and provide long-term housing solutions. This alternative designation should facilitate clear regulatory pathways, enabling THOWs to be treated as legitimate dwellings rather than temporary vehicles. It should be noted that the existing, catch-all “Other Movable Dwelling” designation, that encompasses things from Float Homes to Travel Trailers, is not suitable for THOWs.

The Technical Panel explored the designation of “Certified Tiny Home on Wheels”, however this designation conflicts with CSA protocols. The designations of “Legal Tiny Home on Wheels” and “Mobile Home on Wheels” were also proposed, but no final determination was made by the Technical Panel, necessitating further exploration in the next phases of work.

### **6.2 Water and Wastewater Management Solutions**

Effective water and wastewater management is essential for the sustainable integration of THOWs. This requires addressing the challenges associated with connecting THOWs to essential utilities while ensuring compliance with health and safety standards.

For potable water, options include connections to municipal water systems or approved private wells. Wastewater management can involve septic systems or connections to municipal sewer lines. Innovative solutions like composting toilets and greywater systems, provided they meet regulatory requirements, should also be considered.

Clear standards for utility connections, inspection, and approval are necessary. Collaboration with local health authorities and Registered Onsite Wastewater Professionals (ROWPs) is crucial to ensure the safety and sustainability of water and wastewater systems.

### **6.3 Analysis of Insurance Considerations**

Insurance coverage for THOWs is a significant challenge due to their designation as RVs and the perceived risks associated with mobile dwellings. While local area governments

cannot enable insurance policies, they can partner with providers to facilitate insurers' understandings for THOWs in the Trust Area as insurers often hesitate to provide full coverage leaving THOWs residents vulnerable. The challenges of obtaining insurance directly affect the ability of THOWs owners to obtain traditional financing.

To address this issue, a comprehensive analysis of insurance challenges and potential solutions is needed. This includes:

- Risk Assessment: Developing a standardized risk assessment framework that considers the unique characteristics of THOWs, including their construction standards, foundation connections, and utility hookups.
- Policy Development: Working with insurers to develop specialized insurance policies tailored to THOWs, recognizing their compliance with building codes and safety standards.
- Documentation and Certification: Emphasizing the importance of thorough documentation and third-party certification to demonstrate the quality and safety of THOWs construction.
- Partnerships: Establishing partnerships with insurers and industry associations to promote THOWs insurance and address coverage gaps so that current specialized insurance solutions for THOWs become more standardized such as for traditional homes.

## **6.4 Technical Panel Recommendations**

### **6.4.1 Proposed THOWs Designations and Water/Wastewater Solutions**

Research during this project, along with the work of the Technical Panel, came up with the following recommendations for THOWs designations and addressing water and wastewater solutions for THOWs:

1. Designation: Developing a new designation for THOWs that reflects their status as small, moveable residential structures, distinct from RVs.
2. Local Compliance Guidelines: Establishing clear guidelines for utility connections, emphasizing compliance with local servicing standards and health authority regulations.
3. Approved Systems: Promoting the use of approved alternative wastewater systems, such as composting toilets and greywater systems, where appropriate.
4. Professional Inspections: Requiring inspections by qualified professionals to ensure the safety and functionality of water and wastewater systems.
5. Potable Water Materials: That potable water certified materials are used with regard to off-grid potable water harvesting and rainwater catchment, such as roofing and conveyance materials.

#### 6.4.2 Recommendations for Improved THOWs Insurability

1. Standardized Insurance Framework: Developing a standardized risk assessment framework for THOWs, considering factors such as construction standards, foundation connections, and utility hookups.
2. Third Party Certifications: Encouraging the use of third-party certifications (e.g., Intertek, QAI) to demonstrate compliance with building codes and safety standards.
3. Partnerships: Facilitating partnerships between THOWs builders, insurers, and industry associations to develop specialized insurance policies.
4. Insurance Education: Providing educational resources to THOWs residents on insurance options and risk mitigation strategies.
5. Correlative Standardization: That financial institutions who will loan for and insure a CSA Z240MH should insure a tiny home on wheels that meet this standard, as described in this report.

THOWs insurance is currently offered through specific underwriters, however, coverage is variable depending on the nature of construction, foundation attachments and professional assurances. Valuations for insurance purposes also require specialized attention by insurers, as the process for determining valuations for THOWs differs significantly from the process for traditional homes.

## **7. Affordability, Economic Impact, Housing and Environmental Considerations**

### **7.1 Market Affordability Analysis and Economic Impacts of THOWs**

THOWs have been extensively studied for their affordability and economic impacts, with widely accepted conclusions, as outlined below.

THOWs offer the potential for increased housing affordability, particularly in areas like the Islands Trust, with lower upfront costs compared to conventional homes. However, long-term affordability is influenced by factors like land acquisition, utility connections, and insurance. Regulatory barriers, including zoning restrictions and RV classifications under the BC Building Code, present significant challenges to their integration.

While THOWs can support local economies by providing worker housing and creating jobs, municipalities express concerns about infrastructure strain and property tax revenue. Land availability and servicing requirements are crucial considerations. BC Housing's research<sup>1</sup> highlights the need to address these regulatory and infrastructural hurdles to realize THOWs' potential.

### **7.2 Housing Needs Assessment**

Local governments should conduct a Housing Needs Assessment to determine how THOWs fit into their local housing mix. This assessment should consider the specific needs of various demographics, the availability of land and infrastructure, and the potential economic and social impacts of THOWs integration. Understanding these factors will ensure that THOWs are integrated in a way that aligns with the community's overall housing strategy and contributes to its long-term sustainability.

### **7.3 Environmental and Off-Grid Considerations**

THOWs offer a significantly smaller environmental footprint compared to conventional homes, due to their reduced size, resource consumption, and potential for off-grid living. This translates to lower infrastructural needs, reducing the environmental impact of development. Promoting energy efficiency and responsible waste management in THOWs development is essential for maximizing these environmental benefits.

The integration of off-grid technologies can further enhance the environmental sustainability of THOWs. Solar panels can provide renewable energy, reducing reliance on traditional electricity grids. Rainwater harvesting systems and bulk purchased water can supplement or replace municipal water supplies, conserving water resources. Composting toilets and greywater recycling systems can minimize wastewater discharge and reduce the strain on sewage systems.



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However, the implementation of off-grid systems requires careful planning and consideration. Local governments should develop clear guidelines and regulations for off-grid THOWs, ensuring compliance with health and safety standards. This includes standards for solar panel installation, rainwater harvesting, greywater recycling, and composting toilet systems.

The reduced infrastructural needs of THOWs, particularly those utilizing off-grid systems, can also translate to cost savings for local governments. This can free up resources for other essential services and contribute to overall community sustainability.

Furthermore, THOWs can promote a culture of sustainable living by encouraging residents to adopt energy-efficient practices and minimize their environmental impact. Education and awareness programs can play a crucial role in promoting sustainable living practices within THOWs communities.

## 8. Regulatory Framework Roadmap

### 8.1 Prioritized Recommendations

The Tiny Homes on Wheels Enablement Project has identified several critical areas requiring regulatory reform to facilitate the responsible integration of THOWs. Based on the analysis of existing regulations, best practices, and the outcomes of the Technical Panel Workshop, the following prioritized recommendations are proposed:

1. Develop a Distinct THOWs Designation: Establish a new regulatory designation for THOWs, separate from Recreational Vehicles (RVs) and Park Trailers, reflecting their status as small, moveable residential structures. This designation should facilitate clear regulatory pathways and enable THOWs to be treated as legitimate dwellings.
2. Amend Zoning Bylaws: Amend zoning bylaws to explicitly permit THOWs in designated areas, establishing clear guidelines for placement, occupancy, and servicing. This includes addressing minimum square footage requirements and allowing for flexible siting options.
3. Establish THOWs Construction Standards: Develop and adopt construction standards for THOWs, aligning with CSA Z240MH and the intent of the BC Building Code. This ensures structural integrity, fire safety, and energy efficiency.
4. Implement Standardized Inspection Protocols: Develop and implement standardized inspection protocols for THOWs, covering all aspects of construction, foundation, and servicing. This includes multi-stage inspections and clear processes for utility hookups.
5. Develop Servicing Standards: Establish clear and consistent servicing standards for THOWs, including water, sewer, and electrical connections. This includes collaboration with local health authorities and Registered Onsite Wastewater Professionals.
6. Address Insurance Challenges: Develop strategies to address insurance challenges, including the development of specialized insurance policies and the promotion of third-party certifications.
7. Create Templated Bylaws and Guidelines: Develop templated bylaws that can be customized by local governments, and planning guidelines that provide clear definitions, regulations, and best practices for THOWs integration by local governments.
8. Promote Public Education and Engagement: Conduct public engagement initiatives to address community concerns and build awareness for THOWs.
9. Explore Alternative Wastewater Solutions: Approve the use of alternative wastewater solutions when appropriate, such as composting toilets.
10. Educate Building Officials: Take the opportunity to inform building officials of the applicability of CSA Z240MH construction standards to THOWs, and their appropriate designation, once agreed upon and finalized.

11. Engage the Province: THOWs enablement requires the engagement of the BC Provincial Government. Currently, there are challenges with Provincial bodies being aware of the current state of the art for THOWs, hindering their wider adoption.

## 8.2 Actionable Implementation Steps

To translate these recommendations into action, the following implementation steps are proposed:

1. Formation of a Cross-functional THOWs Implementation Working Group: Establish a multi-disciplinary working group comprising representatives from the Islands Trust, the Regional District of Nanaimo (RDN), building officials, planners, industry professionals, and community members. This group will oversee the implementation of the recommendations and engage more stakeholders, including the Province of BC.
2. Drafting of Templated Bylaws and Guidelines: Develop draft templated bylaws that can be customized by local governments, and planning guidelines based on the prioritized recommendations. This includes defining THOWs, establishing zoning regulations, and outlining servicing standards.
3. Public Consultation and Feedback: Conduct public consultations to gather feedback on the draft bylaws and guidelines. This includes workshops, surveys, and online forums.
4. Revision and Adoption of Bylaws and Guidelines: Revise the draft bylaws and guidelines at the local government level based on public feedback and adopt them through the appropriate legislative processes.
5. Development of Inspection Protocols and Checklists: Develop standardized inspection protocols and checklists for THOWs, ensuring clarity and consistency in the inspection process.
6. Training and Education Programs: Develop and deliver training and education programs for building officials, planners, and industry professionals on THOWs construction, inspection, and regulation.
7. Collaboration with Insurance Providers: Engage with insurance providers to develop specialized insurance policies for THOWs.
8. Development of Public Education Materials: Develop public education materials, including brochures, websites, and videos, to inform the public about THOWs and address community concerns.
9. Pilot Projects: Initiate pilot projects to demonstrate the feasibility and benefits of THOWs integration in selected communities.
10. Ongoing Monitoring and Evaluation: Establish a system for ongoing monitoring and evaluation of the implemented regulations and guidelines, making adjustments as needed.

## 8.3 Proposed Implementation Phases

The successful implementation of the THOWs regulatory framework necessitates a phased approach, ensuring that each stage builds upon the previous one. Given the critical nature of housing affordability in the Trust Area, and the relatively straightforward pathway for enabling THOWs, a rapid rollout is proposed. The proposed phases will necessitate quick action from all stakeholders and will require a very capable and dynamic cross-functional THOWs Implementation Working Group, that is clearly aligned and effectively led.

1. Initial Phase: The initial phase will focus on foundational activities. This includes the formation of the cross-functional THOWs Implementation Working Group, which will serve as the central coordinating body, and the drafting of templated bylaws that can be customized by local governments, and planning guidelines based on the prioritized recommendations. Concurrent with these activities, initial public consultations will be conducted to gather early feedback and identify potential areas for refinement. The development of standardized inspection protocols and checklists will also be a priority during this phase, laying the groundwork for consistent and effective enforcement.
2. Second Phase: The second phase will focus on the refinement and adoption of the bylaws and guidelines. This will involve a thorough review of public feedback, followed by revisions and the formal adoption of the regulatory framework through the appropriate legislative processes. Training and education programs will be developed and delivered to building officials, planners, and industry professionals, ensuring they have the necessary knowledge and skills to implement the new regulations. Collaboration with insurance providers will be initiated to develop specialized insurance policies for THOWs, addressing a critical barrier to their widespread adoption. Public education materials will be developed and disseminated to inform the public about THOWs and address any concerns.
3. Final Phase: The final phase will focus on the practical application and evaluation of the regulatory framework. Pilot projects will be initiated in selected communities to demonstrate the feasibility and benefits of THOWs integration, providing valuable data and insights for future refinements. An ongoing monitoring and evaluation system will be established to track the effectiveness of the implemented regulations and guidelines, making adjustments as needed. This phase will also include amendments to official community plans to support the new regulations.

## 9. Conclusions and Next Steps

### 9.1 Summary of Key Outcomes

The Tiny Homes on Wheels Enablement Project has successfully developed a comprehensive regulatory framework roadmap, designed to facilitate the responsible integration of THOWs as a viable housing option within the Islands Trust Area. Through rigorous analysis of existing regulations, best practices research, and the valuable insights from the Technical Panel Workshop, this project has addressed critical challenges and opportunities associated with enabling the development of THOWs in the Trust Area, and has provided a solid foundation for the next stages of work.

Key achievements of this project include:

1. Established Regulatory Framework Roadmap: The project has outlined a clear regulatory pathway for THOWs, proposing a distinct THOWs designation (separate from RVs and Park Trailers) and recommending amendments to zoning bylaws. While the designation has been explored, further work by the cross-functional THOWs Implementation Working Group is necessary to finalize and implement these proposals.
2. Developed Key Relationships: The project has fostered strong relationships between the Islands Trust, the RDN, and industry professionals, which will be fundamental to the next phases of work.
3. Clarified Need for Cross-functional THOWs Implementation Working Group: THOWs enablement efforts to date have focused on research and planning aspects and the project recommended that a diverse group of local government representatives along with building, inspection, servicing and planning professionals, as well as community members, be struck immediately to tackle the important implementation work that lies ahead. Many constituents are counting on this Implementation Working Group to deliver more secure and affordable housing solutions in a timely manner.
4. Identified Construction Standards: The project has recommended construction standards for THOWs, aligning them with CSA Z240MH and the intent of the BC Building Code, to ensure safety, durability, and energy efficiency.
5. Drove Industry Responsiveness: The project has demonstrated industry responsiveness in supporting THOWs enablement within the Trust Area.
6. Attracted External Interest: The project has attracted significant attention from jurisdictions outside the Islands Trust Area, indicating the broader relevance of its findings.

7. Recommended Templated Bylaws and Planning Guidelines: The project has recommended the development of templated bylaws that can be customized by local governments, and planning guidelines to provide local governments with practical tools for THOWs regulation. The actual drafting of these bylaws will be the responsibility of Islands Trust and RDN staff.
8. Proposed Inspection Checklists: The project has proposed the creation of inspection checklists, which would still need to be developed.
9. Identified Servicing Standards: The project has recommended clear servicing standards for THOWs, including water, sewer, and electrical connections, to address infrastructural challenges.
10. Recommended Strategies for Insurance Challenges: The project has explored and recommended strategies to address insurance challenges, including the development of specialized insurance policies and the promotion of third-party certifications. However, obtaining insurance for THOWs cannot be guaranteed.
11. Recommended Public Education and Engagement: The project recommends the initiation of public education and engagement initiatives to foster understanding of THOWs and address community concerns.

It is important to note that while this project has achieved its goal of developing the regulatory framework roadmap, the implementation of the framework requires further work by the cross-functional THOWs Implementation Working Group.

These outcomes collectively provide a roadmap for the responsible integration of THOWs, contributing to housing affordability and diversity within the region.

## **9.2 Future Considerations**

Further research and strategic considerations are crucial for successful implementation and long-term sustainability.

- Existing THOWs Risk Assessment:
  - A critical priority is addressing the existing stock of THOWs within the Trust Area, which may vary significantly in construction quality and compliance.
  - The 2021 Census data for the Gulf Islands (Galiano, Mayne, North and South Pender Islands, Saturna) identified 90 occupied 'movable dwellings,' a category that includes mobile homes and other movable dwellings such as houseboats and recreational vehicles. This figure suggests a notable existing presence of potentially unpermitted and unregulated dwellings that require assessment.

- Local governments must conduct thorough risk assessments to evaluate the safety and suitability of these existing THOWs.
- The cross-functional THOWs Implementation Working Group should collaborate with local governments to develop policies for regulating and legalizing existing THOWs, balancing safety concerns with the need for affordable housing solutions.
- It is vital to distinguish between "enabling THOWs development" (new builds) and addressing the policy and risk assessment related to existing THOWs.
- This project does not purport to provide risk assessment guidelines, which must be determined by local governments.
- Provincial Engagement:
  - Continuous engagement with the Province of BC is essential for aligning local regulations with provincial building codes and standards.
  - Collaboration with the Province will ensure consistent and effective THOWs integration across the region.
- Long-Term Monitoring:
  - Establish a long-term monitoring program to observe the effects of the bylaw changes.
- Industry Regulation and Legalization:
  - A comprehensive approach to regulating and legalizing the THOWs industry is needed, including establishing clear standards for manufacturers, builders, and installers.
- Environmental Sustainability:
  - Explore strategies to enhance the environmental sustainability of THOWs, including the use of renewable energy, water conservation measures, and sustainable building materials.
- Social Equity and Inclusion:
  - Examine the potential impacts of THOWs integration on social equity and inclusion, ensuring that THOWs are accessible to diverse populations.
- Community Integration:
  - Explore strategies for integrating THOWs into existing communities, including considerations for site design, landscaping, and shared amenities.
- Off-Grid Solutions:
  - Research off-grid solutions and the regulatory hurdles they pose.
- Financing and Lending Options:
  - Investigate innovative financing and lending options for THOWs, addressing the current challenges associated with accessing capital.



## **Appendix A: Steering Committee: Background and Members**

Written by: Mairead Boland, Tobi Elliott, Vanessa Craig and Laura Patrick

Date: April 3, 2025

### **Introduction**

This background describes the origin, and sets the context for the project.

The Tiny Homes On Wheels (THOWs) Enablement Project began in September 2024 at the direction of Islands Trust Council, to address the regulatory challenges of Tiny Homes on Wheels as a viable and legal housing option within the Islands Trust Area.

### **Geographic Location and Jurisdiction**

The Islands Trust was established by the Province of BC in 1974, to protect the island communities, culture and environment for the benefit of the island residents and the province. The mandate of the Islands Trust is described in the Islands Trust Act:

[https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96239\\_01](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96239_01)

The Islands Trust respectfully acknowledges that the lands and waters that encompass the Islands Trust Area have been home to Indigenous Peoples since time immemorial. We are committed to reconciliation and to working together to preserve and protect this ecologically, culturally, and spiritually significant region in the Salish Sea.

The Islands Trust Area covers over 400 islands located in the territories of 26 Coast Salish Nations, from Denman Island in the north, to Saturna Island in the south. Thirteen autonomous Local Trust Committees (LTCs) have jurisdiction over land use planning and zoning. Eight Regional Districts have jurisdiction over services such as parks, solid waste/recycling, utilities, and—most importantly for this project—building inspection and permitting.

Map of the Trust area and associated Regional Districts.

<https://islandstrust.bc.ca/document/regional-districts/>

### **Rural Housing Context**

Similar to rural communities all over British Columbia, communities in the Trust Area struggle with a lack of diverse housing stock and are experiencing severe shortages of housing for essential workers. Many are insecurely housed in unsafe, or unstable housing, but all too often these arrangements are the only options available.

There is a strong need for housing alternatives, including small-scale designs that are sustainable, low-impact, and in keeping with the character of the islands. Tiny homes, as moveable housing units, are one solution. The Tiny Homes on Wheels (THOWs) project was conceived



The Tiny Homes on Wheels (THOWs) project was conceived “to explore the barriers to legal occupancy of tiny homes on wheels and the associated siting and use regulations” (Dec 2024 Trust Council resolution) - so that those who choose or need to “live tiny” can live safely and legally.

### **Previous Advocacy**

A previous resolution put forward by the Union of British Columbia Municipalities (UBCM) in September 2022, requested that the Province work with local governments “to review the BC Building Code to address barriers such as, but not limited to, egress, headroom and window and door size, and to recognize, allow and provide building requirements for tiny homes.” The Province responded that “The Building Code has no limit on how small a house can be built, provided it meets the minimum standard for the protection of people and protection of the environment. ... Several manufacturers in BC have successfully designed and installed tiny homes that meet the safety standards of the Building Code ... Tiny homes on wheels have unique considerations such as connections to potable water, utilities, and sewage disposal.”

The full text of the UBCM motion and response is here:

<https://www.ubcm.ca/convention-resolutions/resolutions/resolutions-database/tiny-homes>

The unique regulatory challenges of enabling THOWs as an option for rural and small communities are still unaddressed.

### **Convening a Technical Working Group**

The Islands Trust’s Housing Action Plan was adopted in December 2023, which included an action to advocate to the Province regarding tiny homes. A working group of the Islands Trust Regional Planning Committee formed to assess the challenges and develop a proposal.

The Working group concluded that three key areas should be addressed if THOWs were to become a viable solution:

- Consider tiny homes as an allowable dwelling unit in land use policies and regulations,
- Address tiny homes through the provincial Building Code,
- Investigate ways to regulate and legalize this housing form, and its associated industry.

The working group proposed that multidisciplinary Technical Panels be convened to review current regulatory requirements, building standards and agree to actions that would enable THOWs in rural areas, including the Trust Area.

This proposal to convene technical roundtables with building and permitting authorities (Regional Districts) and Islands Trust staff was timely for the Regional District of Nanaimo, as the RDN Board had previously given direction to investigate the question of legalizing tiny homes. The THOWs Enablement project was approved and assigned a modest budget by Trust Council at its September 2024 meeting.

## Governance

A Steering Committee comprising four Trustees from across the Trust area, and four representatives from Regional Districts with interest in the project, was formed (Terms of Reference is attached as Appendix B. The geographical spread of interest lends further weight to the importance of finding a path to enable the responsible integration of THOWs as a legitimate, sustainable and affordable housing option. A project manager was engaged (Nov 2024) and the Steering Committee provided oversight and direction, and ensured the project's outcomes would be practical and implementable.

The Steering Committee:

- Islands Trust:
  - Mairead Boland, Chair, Saturna Island Local Trustee
  - Laura Patrick, Salt Spring Island Local Trustee
  - Tobi Elliott, Gabriola Island Local Trustee
  - Aaron Campbell, North Pender Island Local Trustee
- Area B (Gabriola, DeCourcy, Mudge island), Regional District of Nanaimo:
  - Vanessa Craig, Electoral Area Director
- Capital Regional District:
  - Paul Brent, Southern Gulf Islands Electoral Area Director
- Area B (Cortes Island), Strathcona Regional District:
  - Mark Vonesch, Electoral Area Director
- Regional District of Okanagan-Similkameen:
  - Adrienne Fedrigo, Electoral Area Director and Chair of Tiny Home Builder's Association

The Steering committee met throughout Winter 2024-2025, and approved a project charter for the Technical Panel's work in early February 2025. (Technical Panel Charter found in Appendix F).

## Summary of Project Execution and Outcomes:

The charter for the Technical Panel describes the goals and the diverse disciplines it was hoped would participate. Building code, land use planning, construction, and connected services in a rural setting, all were addressed in a one-day workshop on March 12, 2025.

## Next Steps:

The hope is that this project will inspire many local governments to collaborate on next steps towards the goal of making THOWs a safe and legal option of housing, particularly for rural communities. As there is keen interest across the Province, we hope this project gains momentum, that it can be a useful reference to all local governments, and that we can collaborate in the next stages of developing and implementing tangible solutions.

## Appendix B: Steering Committee Terms of Reference

### Steering Committee Terms of Reference

December 2024

#### Section 1: Introduction

The Islands Trust, recognizing the urgent need for affordable housing solutions within its jurisdiction, has initiated a project to explore potential modifications to building codes and siting and use regulations that would enable the development of Tiny Homes on Wheels. A steering committee was established to oversee this project (November 2024) and the participants are listed below. This Terms of Reference document (ToR) outlines the purpose, scope, responsibilities, and expectations of the Steering Committee.

#### Section 2: Purpose

The Steering Committee will oversee the project by playing a crucial role in:

- Providing strategic direction and oversight for the project.
- Reviewing and approving project plans, budgets, and timelines.
- Making key decisions regarding the project's scope, priorities, and deliverables.
- Ensuring alignment with the Islands Trust's overall goals and policies.
- Monitoring project progress and addressing any issues or challenges that may arise.
- Providing input on the development of recommendations and policies related to Tiny Home development in the Trust Area.
- Facilitate communication and collaboration among stakeholders.
- Members of the Steering Committee will inform their organizations with respect to this project.  
by
  - Providing regular updates on project progress and key decisions
  - Presenting the final project report and recommendations
  - Seeking guidance and direction on key strategic issues and policy considerations

#### Section 3: Scope

In specific terms, The Steering Committee's scope of work covers the following:

1. Reviewing and Approving Project Plans: Reviewing and approving the project's work plan, budget, and timelines, as well as ongoing changes thereto.
2. Providing Strategic Guidance: Providing strategic input on the project's direction, priorities, and decision-making. Also providing reasonable and appropriate prior work(s) to further inform the project's context.

3. Overseeing Project Progress: Monitoring the project's progress and ensuring it is on track to meet its objectives.
4. Making Key Decisions: Making critical decisions related to the project, such as the selection of the technical panel members and the approval of recommendations.
5. Resolving Issues: Addressing any issues or challenges that may arise during the project, whether they be related to content, people or procedures of the project.
6. Ensuring Stakeholder Engagement: Facilitating communication and collaboration with key stakeholders across Islands Trust, the Regional District of Nanaimo and other interested jurisdictions.
7. Reviewing and Approving Final Report: Reviewing and approving the final project report and its detailed recommendations.
8. Approving Key Documents:
  - a. Steering Committee Terms of Reference Document: December 20, 2024
  - b. Technical Panel Terms of Reference Document: expected January 17, 2025
  - c. Final Project Report and Recommendations: expected March 28, 2025

#### **Section 4: Steering Committee Membership**

The Steering Committee will be composed of the following members:

- Mairead Boland (Chair), *Islands Trust Saturna Trustee*
- Tobi Elliott, *Islands Trust Gabriola Trustee*
- Aaron Campbell, *Islands Trust North Pender Trustee*
- Laura Patrick, *Islands Trust Saltspring Trustee*
- Vanessa Craig, *Electoral Area Director, Area B (Gabriola), RDN*
- Paul Brent, *Southern Gulf Islands Electoral Area Director, CRD*
- Adrienne Fedrigo, *Electoral Area Director, Regional District of Okanagan-Similkameen, Chair of Tiny Home Builder's Association*
- Mark Vonesch, *Electoral Area Director, Area B (Cortes Island), SRD*

#### **Section 5: Roles and Responsibilities**

- Chair:
  - o Oversees the Steering Committee's activities.
  - o Sets the agenda for meetings.
  - o Facilitates discussions and decision-making.

- o Ensures that the Steering Committee adheres to its Terms of Reference.
- **Committee Members:**
  - o Regularly attend and participate in Steering Committee meetings.
  - o Provide input and expertise on project decisions and recommendations.
  - o Make informed decisions based on available information and sound judgment.
  - o Foster a collaborative and inclusive environment among committee members and stakeholders.
  - o Adhere to the Islands Trust’s governance policies and procedures.
- **Project Team:** In addition, the Steering Committee will have the benefit of an outside consultant, Simon Reid, who will provide project management, meeting facilitation and final report creation services. Assisting Simon will be Robert Kroeker, Islands Trust Planning Services Administrative Assistant, who will provide meeting co-ordination, minute taking and document management services. Simon will be managed by the Steering Committee to ensure that:
  - o Regular updates on project progress are provided to the Steering Committee
  - o Documents and reports are prepared and presented to the Steering Committee
  - o Project budgets and resources are properly managed
  - o Co-ordination between the Technical Panel and other stakeholders is being properly managed

## **Section 6: Meeting Schedule**

The Steering Committee will meet approximately four times throughout the project (beginning on December 20, 2024), with the frequency and format of meetings determined by the Committee’s needs and the project’s progress. Meetings may be held in person or virtually.

## **Section 7: Decision-Making**

Decisions of the Steering Committee shall be made by consensus or by a majority vote. In the event of a tie, the Chair shall have the casting vote.

## **Section 8: Reporting to the Steering Committee**

The Project Manager will provide regular updates to the Steering Committee on the project’s progress, including:

- **Progress Reports:** Written progress reports on a monthly basis preceding Steering Committee meetings (key milestones achieved, challenges encountered and solutions implemented, changes to project scope or timeline).
- **Financial Reports:** Financial reports on a monthly basis preceding Steering Committee meetings.
- **Risk Reports:** [FREQUENCY] updates on identified risks and mitigation strategies.

## **Section 9: Meeting Minutes**

Meeting minutes for the Steering Committee will be produced starting at the December 20, 2024 meeting, now that all roles and responsibilities have been finalized.

## **Section 10: Evaluation**

The effectiveness of the Steering Committee will be evaluated through:

- Self-Assessment: Regular self-assessments by the Committee members.
- Project Manager Feedback: Feedback from the Project Manager on the Committee's performance.
- External Evaluation: Potential external evaluation of the project's overall success and the Committee's contribution.

## **Section 11: Terms of Reference Duration**

These Terms of Reference shall remain in effect until the completion of the project or until they are amended or revoked by the Islands Trust.

## Appendix C: Analysis of Current BC Building Codes for THOWs

### C.1 Introduction

This appendix provides an analysis of the applicability of several CSA standards to THOWs within the British Columbia context. The standards under consideration are CSA Z240RV, CSA Z240MH, CSA Z241RV, and CSA A277MH. This analysis will examine these standards in relation to the British Columbia Building Code (BCBC) and explore their implications for the construction and regulation of tiny homes on wheels. The analysis is based on a review of the standards themselves, the BCBC, relevant local government bylaws, and interpretations provided by industry experts and stakeholders. The primary goal is to identify how these standards intersect with the BCBC, where gaps and challenges exist, and how these factors affect the development and acceptance of tiny homes on wheels as a viable housing option in British Columbia. A clear understanding of these regulatory complexities is crucial for informing future policy development and promoting safe, sustainable, and affordable housing solutions.

### C.2 CSA Z240RV and CSA Z241RV: Recreational Vehicle Standards

CSA Z240RV and CSA Z241RV are standards developed for recreational vehicles and park model trailers, respectively. These standards are designed with a focus on mobility and temporary habitation, and their applicability to tiny homes on wheels is a complex issue.

- CSA Z240RV: Standard for Recreational Vehicles  
CSA Z240RV establishes requirements for a wide range of recreational vehicles, including travel trailers, fifth-wheel trailers, and motorhomes. These vehicles are primarily intended for temporary, recreational, or seasonal use. The standard emphasizes safety aspects related to their mobile nature, such as requirements for propane systems, electrical systems during travel, and vehicle dynamics. However, tiny homes on wheels, while sharing the characteristic of mobility, often differ significantly in their intended use from typical recreational vehicles. Many tiny home owners seek to use their dwellings as year-round residences, blurring the line between recreational and residential use. This distinction creates a fundamental challenge when applying CSA Z240RV to tiny homes. The standard lacks comprehensive requirements for long-term habitability. For example, it may not adequately address insulation, ventilation requirements for continuous occupancy, moisture control, and the durability of materials intended for permanent residency. Furthermore, the application of CSA Z240RV to tiny homes can lead to conflicts with the BCBC. The BCBC is designed for permanent dwellings and sets out requirements for structural integrity, fire safety, and health and safety that may exceed or differ from those in CSA Z240RV. This discrepancy creates confusion for both builders and regulators. Local authorities, faced with the challenge of regulating these unique structures, often default to CSA Z240RV due to the presence of wheels, even when

the intended use is clearly residential. This can result in the application of inappropriate standards and inconsistent regulatory approaches across the province.

- CSA Z241RV: Standard for Park Model Trailers

CSA Z241RV governs park model trailers, which are larger recreational units designed for placement in designated parks. While offering more living space than typical RVs, park model trailers are still intended for recreational or seasonal use. These units often have restrictions on the use of permanent foundations and are subject to specific zoning and land-use regulations within park settings. Tiny homes on wheels, conversely, are often intended for use on a variety of land parcels, including private lots, and their owners may seek to establish them as permanent residences. The restrictions on foundation type and land use associated with CSA Z241RV make it an unsuitable standard for tiny homes intended for permanent occupancy.

A central issue is the BCBC's inadequate handling of the distinction between recreational and residential use in the context of tiny homes on wheels. This lack of clarity leaves a regulatory gap, forcing local authorities to make ad-hoc decisions and leading to a patchwork of regulations.

### **C.3 CSA Z240MH and CSA A277MH: Manufactured Home Standards**

CSA Z240MH and CSA A277MH are standards related to manufactured homes, which are factory-built structures designed for permanent residential use. These standards offer a more comprehensive framework for regulating tiny homes intended for full-time living.

- CSA Z240MH: Standard for Manufactured Homes

CSA Z240MH sets out detailed requirements for the design and construction of manufactured homes, covering all aspects of a dwelling, including structural systems, electrical systems, plumbing, and heating, ventilation, and air conditioning (HVAC) systems. These standards are designed to ensure the safety, durability, and long-term habitability of manufactured homes.

For high-quality tiny homes on wheels designed for permanent residential use, CSA Z240MH offers a potentially relevant framework. It provides a robust set of requirements that address the same concerns as the BCBC, such as structural integrity, fire safety, and health and safety. Adhering to these standards can provide a pathway for demonstrating that a tiny home is built to a level of quality suitable for residential use.

However, applying CSA Z240MH to tiny homes on wheels also presents challenges. One significant issue is the standard's requirements for foundations, which are typically designed for site-built or manufactured homes intended to be placed on a permanent location. Tiny homes on wheels, by definition, are designed to be mobile, and traditional foundation requirements may not be appropriate for their construction. Additionally, the definition of a "manufactured home" in the BCBC and

related regulations may not encompass the diversity of designs and construction methods used for tiny homes on wheels, excluding many such structures from this regulatory pathway.

- CSA A277MH: Procedure for Certification of Prefabricated Buildings  
CSA A277MH establishes a procedure for certifying prefabricated buildings, including manufactured homes, to ensure compliance with applicable standards. This certification process can provide assurance to both regulators and consumers that a factory-built structure meets the necessary safety and quality requirements. For tiny home manufacturers, CSA A277MH certification could be a valuable tool for demonstrating compliance with residential standards. By obtaining certification under this standard, manufacturers can provide evidence that their tiny homes are constructed to a high level of quality and safety.  
A key challenge, however, lies in adapting the certification process to the unique characteristics of tiny homes on wheels. As mentioned earlier, the interpretation of "foundation" in relation to these structures needs clarification. Furthermore, there needs to be a clear process for how a movable dwelling can be certified under a standard intended for structures that are typically placed on permanent foundations.

#### **C.4 Gaps, Challenges, and BCBC Interface**

The current regulatory framework in British Columbia presents several gaps and challenges for tiny homes on wheels. The BCBC lacks specific provisions tailored to these structures, leading to ambiguity in their designation as either recreational vehicles or dwellings. This ambiguity results in inconsistent enforcement across different local jurisdictions.

One of the most significant gaps is the absence of clear guidelines for infrastructure connections, such as electrical, plumbing, and sewage, for movable dwellings. This creates difficulties for tiny home owners seeking to connect their homes to essential services, as local requirements vary widely.

These gaps contribute to several challenges. Conflicting interpretations of existing regulations by local authorities create uncertainty for builders and homeowners, making it difficult to obtain building permits and occupancy approvals. This regulatory uncertainty also leads to challenges in obtaining insurance for tiny homes on wheels, further hindering their acceptance as a viable housing option.

The interface between the BCBC and CSA standards is also problematic. In the absence of specific provincial guidance, local governments often default to applying CSA Z240RV standards, which, as discussed earlier, are not designed for permanent residency. In some cases, local authorities may even disregard the issue, leaving tiny homes on wheels in a regulatory void. This lack of consistent provincial direction results in a fragmented and often contradictory regulatory landscape for tiny homes on wheels in British Columbia.



## **Appendix D: Technical Panel Member Bios**

### **Gord Baird (Victoria, BC)**

#### International Rainwater Designer & Installer, ARCSA Accredited Professional

Gord brings extensive expertise in integrated regenerative systems, including rainwater harvesting, greywater systems, and waste management. His background in policy analysis and technical research, coupled with his hands-on experience in building Eco-Sense, provided valuable insights into sustainable infrastructure and regulatory considerations. His ability to address both technical and governance aspects was crucial for developing practical THOWs recommendations.

### **Lexie Boekenkruger (Nanaimo, BC)**

#### Manager, Building Inspection Services, Regional District of Nanaimo

With a background in Architectural and Building Technology from BCIT, Lexie brings crucial expertise in building codes and inspection to the panel. Her experience in managing building inspection services at the RDN provided valuable insights into the practical application of building regulations for THOWs. Her knowledge of construction standards and compliance was essential for ensuring the safety and feasibility within the recommendations.

### **Lisa Grant, MCIP/RPP (Nanaimo, BC)**

#### General Manager of Development and Emergency Services, Regional District of Nanaimo

With 15 years of public sector experience, including her role as Director of Development Services for the City of Port Coquitlam, Lisa brings extensive planning expertise to the panel. Her Master of Planning from Dalhousie University and her experience in both municipal and regional district governments in BC provided valuable insights into regional planning and development considerations for THOWs.

### **Robert Kojima (Victoria, BC)**

#### Regional Planning Manager, Islands Trust

As the Regional Planning Manager, Robert provided essential expertise in planning principles and the specific regulatory context of the Islands Trust. His deep understanding of Official Community Plans and local land use regulations was crucial for the panel's work. His contributions were vital in ensuring the THOWs recommendations aligned with the unique needs and constraints of the Trust Area, and his ability to navigate the complex regulatory environment was invaluable.

### **Paul Nash (Delta, BC)**

#### General Manager, Mint Tiny Homes

Paul brought valuable industry perspective to the panel, drawing on his extensive experience in manufacturing and commercial development. His knowledge of building



codes, coupled with his understanding of tiny home construction, provided practical insights into THOWs discussions. His collaborative approach and ability to bridge industry practices with regulatory considerations were instrumental in shaping the panel's recommendations.

**Pamela Robertson (Gibsons, BC)**

Founder & CEO, Sunshine Tiny Homes

A pioneer in the Canadian tiny home movement, Pamela brought extensive industry knowledge and advocacy to the panel. As a past president and current member of the Tiny Home Alliance of Canada, she provided valuable insights into international building codes and industry best practices. Her expertise was crucial in shaping the panel's understanding of the THOWs landscape and developing practical recommendations. Her passion for accessible housing solutions was a driving force in the panel's work.

**Brad Smith (Victoria, BC)**

Island Planner, Islands Trust

Working closely with the Regional Planning Manager, Brad provided valuable expertise on bylaws and THOWs designations. His contributions complemented the strategic planning work, offering detailed insights into the practical application of regulations. His knowledge of specific Islands Trust bylaws and his ability to analyze THOWs-related designations were essential for developing clear and actionable recommendations for the Trust Area.

**Mike Turner (Chemainus, BC)**

Registered Onsite Wastewater Practitioner - Installer (IN), Planner (PL), ASTTBC

Mike designs onsite wastewater systems for residential and commercial properties. His ASTTBC certifications and experience with septic systems provided vital expertise on THOWs wastewater management. His deep understanding of the Islands Trust context, coupled with his broad knowledge of housing and construction, was key for developing practical and locally relevant recommendations.

**Lisa Zosiak (Nanaimo, BC)**

Senior Housing Planner, Regional District of Nanaimo

Lisa brought valuable planning expertise to the panel, drawing on her experience as a community and urban planner in Maple Ridge, BC. Her insights were particularly helpful in addressing affordability issues related to THOWs development. Her understanding of housing dynamics and her contributions to the panel's discussions on accessible housing options were essential for developing equitable recommendations.

## Appendix E: Technical Panel Charter

### Technical Panel Charter

#### **Section 1: INTRODUCTION**

The Islands Trust is committed to exploring innovative solutions to address the critical shortage of affordable housing within its jurisdiction. This includes investigating the potential of Tiny Homes on Wheels (THOWs) as a viable housing option. To facilitate this exploration, a Technical Panel has been established to provide expert analysis and recommendations regarding required designations, siting, planning and building codes. This Charter outlines the purpose, scope, responsibilities, and operating procedures of this Technical Panel.

#### **Section 2: PURPOSE**

The primary purpose of the Technical Panel is to provide expert advice to the Steering Committee regarding the enablement of THOWs within the Islands Trust Area. The Panel will focus on identifying and addressing regulatory barriers, exploring potential code modifications or exemptions, and developing practical solutions to facilitate the safe and appropriate integration of THOWs as a reasonable accommodation in the Islands Trust Area.

Specifically, the Panel will:

- Analyze existing building codes, regulations, and zoning bylaws relevant to THOWs, including the British Columbia Building Code and related standards.
- Identify potential barriers to THOWs development
- Propose strategies to mitigate barriers, and identify potential agencies who would assist and/or lead.
- Develop clear and actionable recommendations for code modifications, alternative compliance pathways, or alternative regulatory approaches.
- Consider the unique characteristics of THOWs, such as their mobility, size, and potential for low-impact and off-grid systems.
- Ensure that recommendations are practical and feasible, and that affordability and accessible housing values are central to the recommendations.
- Ensure that recommendations support the mandate of the Islands Trust, including the protection of the natural environment and community well-being.

#### **Section 3: SCOPE**

The Technical Panel's scope of work encompasses the following:

*1. Code and Regulatory Analysis:* A detailed review of relevant codes, regulations, and bylaws, focusing on their applicability to THOWs. This includes identifying potential conflicts, gaps, and opportunities for modification.

*2. Technical Discussions and Deliberations:* Facilitated discussions and knowledge sharing among panel members to explore technical solutions and address specific challenges related to



THOWs construction, safety, siting and zoning considerations, servicing and integration. Anticipate 2 virtual meetings, and 1 in-person meeting between Feb 1st and March 31st, 2025.

*3. Development of Recommendations:* Formulating specific, actionable, and well-justified recommendations for the Steering Committee regarding code modifications, alternative compliance pathways, or alternative regulatory frameworks.

*4. Consideration of Key Issues:* Explore and address key issues such as:

- Zoning and land use considerations
- Site planning and integration
- Requirements for services (water, sewer, power)
- Certification options and BC Building Code compliance
- Structural integrity and safety
- Electrical, plumbing, and mechanical systems
- Insurability
- Explore option to request a “Local Government Variance” under Section 7 of the BC Building Act  
([https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/construction-industry/building-codes-and-standards/guides/baguide\\_sectionb1\\_june2016.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/construction-industry/building-codes-and-standards/guides/baguide_sectionb1_june2016.pdf) p. 6)
- Energy efficiency and sustainability
- Mobility and transportability

*5. Collaboration and Communication:* Working collaboratively with the Steering Committee and other stakeholders to ensure effective communication and alignment.

#### **Section 4: PANEL MEMBERSHIP**

The Technical Panel will be composed of experts in relevant fields, including (but not limited to):

- Tiny Home Construction and Building Science
- Plumbing, Water and Wastewater Management
- Building Code Compliance
- Planning and Zoning

Panel members have been selected based on their expertise, experience, and locality in relation to the Islands Trust Area. The Steering Committee will be responsible for the final confirmation of the Panel Members. To date, conversations with the following individuals have been held and these individuals have confirmed their interest and ability to be involved in the Technical Panel on March 12th:

*1. Tiny Home Construction and Building Science:*

- Paul Nash, General Manager, Mint Tiny House Company (Delta, BC): Large-scale Tiny Home builder
- Pamela Robertson, CEO, Sunshine Tiny Homes (Port Mellon, BC): Mid-sized Tiny Home builder

*2. Plumbing, Water and Wastewater Management:*

- Mike Turner, Owner, Turner Designs (Ladysmith, BC): Water and wastewater designer and engineer

- Gord Baird, Eco-Sense and Councillor, District of Highlands (Victoria, BC), and Chair, CRD Regional Water Supply Commission (Victoria, BC), and Chair, JDF Water Distribution Commission (Victoria, BC)

### 3. *Building Code Compliance, and Planning and Zoning:*

- Lisa Grant, General Manager, Development & Emergency Services, RDN (Nanaimo, BC)
- Lexie Boekenkruger, Superintendent, Building Inspection Services, RDN (Nanaimo, BC)
- Lisa Zosiak, Senior Housing Planner, RDN (Nanaimo, BC)
- Robert Kojima, Regional Planning Manager, Islands Trust (Victoria, BC)
- Brad Smith, Island Planner, Islands Trust (Victoria, BC)

\* Given that there are no material issues regarding Fire Safety as a stand alone issue in enabling the development of THOWs in the Trust Area, we have not sought out an independent expert on Fire Safety. Project management recommends that other members of the Technical Panel be relied upon to speak to Fire Safety issues, if needs be.

## **Section 5: ROLES AND RESPONSIBILITIES**

- *Panel Members:*
  - Actively participate in panel meetings and discussions.
  - Contribute their expertise and knowledge to the analysis and development of recommendations.
  - Review and provide feedback on draft reports and recommendations.
  - Adhere to the project timeline and deliverables.
- *Project Manager (Simon Reid):*
  - Facilitate panel meetings and discussions.
  - Provide administrative and logistical support to the panel.
  - Coordinate communication between the panel and the Steering Committee.
  - Prepare meeting minutes and other documentation.
  - Ensure the project stays on track and within budget.
  - Prepare and deliver final report with recommendations to the Steering Committee.

## **Section 6: MEETING SCHEDULE**

The Technical Panel will meet in person at 10am on Thursday March 12th at the Marriott Courtyard in downtown Nanaimo. Additional virtual meetings , though not expected, may be required, to be held on an “as needed” basis (in person or virtually), between February 1st and March 28th, 2025.

## **Section 7: DELIVERABLES**

The Technical Panel will provide the following deliverables to the Steering Committee:

- *Analysis Report:* A report analyzing existing building codes, regulations, and current and potential zoning options relevant to THOWs.



- *Recommendations Report*: A comprehensive report outlining specific recommendations to enable and regulate THOWs, including but not limited to:
  - Acceptable BC Building code alternatives that meet the Code’s Functional Objectives
  - BC Building Code potential amendments
  - Policy and zoning options
  - Amendments to land use bylaws
  - Siting and use
  - Alternative compliance pathways
  - Alternative regulatory approaches, such as requesting a local government variation under section 7 of the BC Building Act
- *Meeting Minutes*: Detailed minutes of all Technical Panel meetings.

**Section 8: REPORTING TO THE STEERING COMMITTEE**

The Project Manager will provide regular updates to the Steering Committee on the Technical Panel’s progress, as defined in the Steering Committee Terms of Reference.

**Section 9: DECISION-MAKING**

The Technical Panel will strive to reach consensus on its recommendations. If consensus cannot be reached, differing viewpoints will be documented and presented to the Steering Committee for consideration. The Steering Committee will make the final decisions regarding recommendations.

**Section 10: TIMELINE**

The Technical Panel’s work will be conducted according to the project timeline established by the Steering Committee (as outlined in the original proposal and subject to updates), as follows:

Activity	Date	Format
Pre-workshop Interview (1hr)	December 17th, 2024 to March 7th, 2025	Video call
Technical Panel Workshop (10am to 4pm)	March 12th, 2025	In Person Workshop
Final Report Interview (1hr)	March 19th, 2025 to March 26th, 2025	Video call

**Section 11: CHARTER DURATION**

This Charter shall remain in effect until the completion of the project or until it is amended or revoked by the Steering Committee.



## Appendix F: Technical Panel Workshop Agenda

**Date:** Wednesday March 12th, 2025

**Time:** 10:00am - 4:00pm (Lunch: Noon - 1:00pm)

**Location:** Master Boardroom, Marriott Courtyard, 100 Gordon St, Nanaimo, BC

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Objective: To explore and recommend the regulatory framework required to enable the development of Tiny Homes on Wheels in the Islands Trust Area.

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### AGENDA

#### 10:00 AM - 10:15 AM: Welcome & Introductions

- Welcome and Opening Remarks (Project Overview, Goals, and Expected Outcomes)
- Introductions of Technical Panel Members
- Review of Workshop Agenda and Objectives

#### 10:15 AM - 11:00 AM: Defining THOWs: Current Status & Challenges

- Presentation: Overview of THOWs:
  - Current Definitions and Designations
  - Existing Regulatory Landscape
  - Current Challenges: Designation, Building Standards, Planning, Inspection, Insurance
- Open Discussion:
  - Clarifying Panel Members' Understanding of THOWs
  - Identifying Key Issues and Concerns from Each Professional Perspective

#### 11:00 AM - 12:00 PM: Building Standards & Inspection Protocols

- Review:
  - Comparison of CSA Standards (Z240/Z241) vs. BC Building Code for Homes, ADUs, Manufactured Homes
  - Best Practices in THOWs Construction and Materials
  - Current Inspection Gaps and Challenges
- Breakout Groups:
  - Group 1: Building Standards - Developing Recommendations for THOWs Construction Standards (Potential alignment with BC Building Code/ADU/Manufactured Home standards).

- Group 2: Inspection Protocols - Designing a Comprehensive Inspection Process for THOWs (Integration with existing municipal processes).
- Report Back & Discussion:
  - Each group presents their findings.
  - Open discussion to refine recommendations and identify potential solutions.

### **12:00 PM - 1:00 PM: Lunch Break**

### **1:00 PM - 2:00 PM: Planning & Siting Considerations**

- Review:
  - Current Municipal Planning Challenges for THOWs (Zoning, Minimum Size, Density, Infrastructure)
  - Best Practices for Integrating THOWs into Community Plans
  - Siting Considerations: Water, Sewer, Electrical Connections
- Open Discussion:
  - Exploring Zoning Options for THOWs (Primary, Secondary, or Dedicated THOWs Parks Use Cases)
  - Addressing Infrastructure and Servicing Requirements
  - Discussing how to create planning tools that enable THOWs.

### **2:00 PM - 3:00 PM: Designation, Water, and Insurance**

- Review:
  - Exploring Alternative Designations for THOWs (Beyond "RV/Mobile Home")
  - Water experts introduction on safe water connection and waste water disposal
  - Insurance Challenges and Potential Solutions (Risk Assessment, Policy Development)
- Breakout Groups:
  - Group 1: Designation & Water - Developing a clear designation for THOWs and water/wastewater solutions.
  - Group 2: Insurance - Identifying Strategies to Improve THOWs Insurability (Documentation, Certification, Partnerships).
- Report Back & Discussion:
  - Each group presents their findings.
  - Open discussion to refine recommendations and identify potential solutions.

### **3:00 PM - 3:45 PM: Developing a Regulatory Framework Roadmap**

- Facilitated Discussion:
  - Prioritizing Key Recommendations from the Day's Discussions
  - Identifying Actionable Steps for Implementing the Regulatory Framework
  - Developing a Timeline for Implementation



- Discussion and recommendations of key accountabilities for each step.

### **3:45 PM - 4:00 PM: Wrap-Up & Next Steps**

- Summary of Key Outcomes and Action Items
- Discussion of Follow-Up Interviews and Communication
- Thank You and Closing Remarks

### Post-Workshop Activities:

- Finalization of recommendations and report completion will be coordinated remotely by Simon Reid (Project Manager), with the assistance of Rob Kroeker (Project Assistant), for submission to the Steering Committee by March 28th.



## Appendix G: Technical Panel Workshop Minutes

### Tiny Homes on Wheels Technical Panel Workshop Minutes of a Meeting

- Date:** March 12, 2025
- Location:** Saysutshun Room, Courtyard Marriott, 100 Gordon St, Nanaimo, BC
- Members Present:** Robert Kojima, Regional Planning Manager, Islands Trust  
Brad Smith, Island Planner, Islands Trust  
Pamela Robertson, Founder, Sunshine Tiny Homes  
Gord Baird, Councillor, District of Highlands and Chair, CRD Regional Water Supply Commission  
Lisa Zosiak, Housing Planner, RDN  
Mike Turner, Owner, Turner Designs  
Lisa Grant, General Manager, Development and Emergency Services, RDN  
Lexie Boekenkruger, Superintendent, Building Inspection Services, RDN
- Member Regrets:** Everett Hann, Building Inspector, RDN
- Staff Present:** Simon Reid, Project Manager, Simon Reid Consulting  
Rob Kroeker, Planning Services Administrative Assistant, Islands Trust / Recorder

#### CALL TO ORDER

- Project Manager Simon Reid called the meeting to order at 10:10 a.m.
- He expressed gratitude that the workshop was occurring in the home and territory of the Snuneymuxw, Snaw-naw-as, and Stz'uminus people, upon whose ancestral lands we live, work and gather.
- He spoke to the uncertain regulatory landscape for tiny homes on wheels in the Islands Trust Area and jurisdictions along the south coast of BC, referencing building standards, inspection and servicing, zoning, and bylaw compliance as key themes of the workshop.

#### INTRODUCTIONS

The workshop participants introduced themselves, speaking to their experience and naming goals for the day's work, including:

- Education to foster understanding and address misinformation around tiny homes.
- Learning and providing knowledge towards tackling the underhousing problem and provisional dwellings.
- To add clarity regarding underhousing from a planning perspective, with awareness of the challenges elected officials face in tackling this problem while

balancing health and safety concerns.

- Breaking down all the reasons why enablement won't work, in order to find a solution with a diverse group of experts working in alignment.
- To view tiny homes as a permanent structure under existing regulations and satisfy regulatory compliance from a servicing perspective.
- Using the lens of affordability as a driver for this initiative, and considering whether tiny homes on wheels are an accessible solution for low-income households or geared towards middle-income households.
- Ascertaining how local governments around BC are treating tiny homes on wheels, and if allowed, under what circumstances?
- Understanding how tiny homes on wheels can be approved within existing permit processes, with provincial regulations currently discouraging their approval.
- Working collaboratively with other jurisdictions towards solutions and seek guidance from one another to move forward in a similar way.
- Recognizing what affordability looks like in rural areas versus municipalities with high densities of housing.
- Taking the opportunity to work together with the tiny home building industry and categorize tiny homes on wheels as something that can be permitted, so that residents can be assured their dwellings are legal, and can procure financing and insurance.

Following introductions, the workshop proceeded by screening a video exploring the features and building standards of a recent model tiny home on wheels. Project Manager Reid explained that the purpose was to establish a common understanding of the current standards employed in tiny home building.

## 1. **Defining Tiny Homes on Wheels (THOWs): Current Status and Challenges**

Project Manager Reid introduced the topic, beginning by encouraging the Technical Panel to consider the definition of a tiny home on wheels by discussing the characteristics that determine, or exclude, dwellings from this category. Technical Panel discussion included:

### **Defining Tiny Homes on Wheels**

- Standards not applicable to tiny homes on wheels include the CSA Z241 Park Model Trailers designation, and the CSA Z240 RV Series designation of units primarily designed as temporary living quarters.
- 10 years ago, builders found a standard that fit moveable tiny homes, the CSA Z240 standard. Since then, many design and build to the CSA Z240 MH standard, with units on wheels but satisfying the BC Building Code and permitting standards. This is something the Tiny Homes Builders Association is trying to help builders meet across Canada.
- Has there been discussion in the building industry about the CSA A277 standard for modular homes? In the last decade, a shift has occurred from using RV designation to new park models which are the same layout and plans as A277 offerings.
- The Implementation Guide for Small Scale Multi Unit Housing (Bill 44) explicitly states that recreational vehicles are not to be used as full-time residences.
- Two major challenges identified by building departments are tiny home lofts with ladders

and ensuring proper foundations.

- The Tiny Homes Builders Association has had conversations with CSA to address these issues with CSA Z240 MH Series, producing units built with egress and staircases to code. Non-compliant staircases are generally certified as RV.
- Intertek (international) and QAI (BC) provide a high level of CSA certification inspection that many builders comply with.
- Builders are inspected randomly and frequently for certification, and adhere to stringent standards.
- There are even higher inspection standards such as Washington State Labor and Industries (L&I) and every unit sold into WA that is 10-12 ft wide needs their stamp. Safety standards are robust such as a 4x4 roof beam, which is often wood and must be metal by WA L&I standards.
- Inspection of the foundation and servicing connections will be required, and building construction is assured with certification such as with mobile homes.
- Intertek standards bring tiny home builders close to passive housing, with higher standards compared to that of the manufactured home industry.
- One of the challenges is communicating what's being achieved in building standards: egress for fire safety, wall thickness, and legal staircases are elements that are not in typical marketing material.
- Tiny home builder standards generally far exceed the building standards of recreational vehicles. *Differentiating from recreational vehicles is an imperative for the industry.*

### Inspection Protocols

- A checklist or guideline that specifies standards is useful, such as the City of Fresno, CA Development and Resource Management Department guidelines for tiny homes, which demonstrate how this guidance is communicated in other jurisdictions.
- The foundation challenge is easily solvable with helical piles, which are environmentally friendly compared to poured concrete, requiring only two piles on each end for a load-bearing foundation.
- Companies that do helical pile installation provide engineering reporting to municipalities. The piles are bolted or welded to the tiny home frame.
- Tiny homes on a foundation can in theory get building permits and approvals, and zoning is not the obstacle, as it can be amended.
- The issue is that there is a political reluctance to allow something with no inspection regime established. It should be safely sited, connected to a wastewater system, and provided with potable water.
- If the CSA standard can be assured for models with Intertek certification, it could be acceptable if an engineer is willing to say that the unit meets the intent of the building code.
- *Site-built tiny homes without certification will be a concern of local governments.*
- NOAH certification is viewed as problematic by RDN inspection services.
- Pre-approved plans, such as the City of Vancouver's approach with laneway houses, could improve uptake across builders and help with municipal certification and inspection after vetting.
- If the wheels of a tiny home are left on, but code requirements are met for safety, it should not be problematic from a local government perspective.

- The ALC views wheels on mobile homes favorably as they are seen as more temporary and it could be moved for agricultural activities.
- Challenges from a local government perspective are singularly built tiny homes or homes not built to exacting code-compliant standards. *The benefit of a building permit being issued is preferable to pathways for alternative solutions in design.*
- No applications for tiny homes on wheels are received by the RDN to date, perhaps because of misinformation about permissibility.
- It is likely that approvals could be granted based on the CSA Z240 MH standard, and a foundation or tie downs or helical piles, as wheeling the home on to the site will not be sufficient.
- Temporary Use Permits are addressing use in many regions as a provisional solution. The intention with Temporary Use Permits is that the unit eventually comes into compliance.
- Other jurisdictions such as Grand Forks have permission specifically for tiny homes on wheels written into their bylaws, and their work could be potentially replicated.

### **Are Tiny Homes on Wheels Named Properly?**

- Tiny homes on wheels nomenclature has been around for a decade and is well entrenched.
- The word “tiny”: what are the stipulations and is it meaningful and approvable?
- The popular understanding of tiny homes begets unclear terms. One tiny home definition comes from the ASTM International Committee for Tiny Houses: 400 sq ft or less is put forward as the standard.
- The building industry struggles with this: some are dogmatic about a 30 ft size for tiny homes, but Mint Tiny Homes makes 12x44 ft homes similarly. If Mint moved away from the tiny home vernacular, how would consumers find their products as they search?
- Builders see that if planning officials and building inspection staff do not fully grasp the standards applied to tiny homes versus that of RVs, then it is a challenge to explain those differences while marketing to purchasers.
- The term “manufactured home” has a stigma attached to it from past building practices.
- The tiny home name seems fixed, but what matters for local government staff is whether it complies with certification, potable water, wastewater system, and foundation, and siting, and those elements are critical over terminology.
- What is the intent of the BC Building Code and what is trying to be achieved by its provisions? Local government staff are necessarily risk averse.
- Local governments are concerned with building code compliance and the CSA standard that tiny homes on wheels are certified under, and not the fact that they are on wheels and moveable.
- What about calling them “certified” or “legal” tiny homes on wheels to fulfill marketing and assurance needs? Builders report that the CSA Group may ask them to remove such wording.

## **2. Building Standards and Inspection Protocols**

Following this discussion, the participants formed breakout groups to assess key issues.

Breakout Group 1 discussed Building Standards. Their key question was: What are the building standards to aim for and what should the tiny home building industry be held to account on?

Breakout Group 2 discussed Inspection Protocols. Their key question was:

What questions and standards need to be settled for inspecting tiny homes on wheels?

### **Breakout Group 1, Building Standards:**

- Assurances of Intertek and QAI resolve questions around the build through CSA standard compliance, using one of the CSA Z240 or A277 standards. The CSA Z240 MH standard is “double tagged”, having to go through two certification processes.
- Intertek and QAI are the third-party liability holders and verifiers who inspect and pass units based on CSA standards.
- Certification through Intertek is robust, and the main aspect is to ensure that needs for potable water, wastewater, siting, health and safety are met.
- A checklist supplied by local governments could provide guidance to potential owners regarding the above elements.
- *If a self-builder wishes to approach tiny homes without an initial building permit, there is a pathway for them to reach the requisite certification to the appropriate CSA standard, but it will be challenging and must be documented rigorously from the start of the build.*
- *A self-builder may be better served to build a small residential building under the residential building code and go through alternative solutions of the ADU pathway from a dwelling standpoint. It would then require the same inspections as for standard construction.*

### **Breakout Group 2, Inspection Protocols:**

- Certification covers everything within the building to the appropriate CSA standard. External to the tiny home is where inspection hurdles are, such as servicing, siting, water, and locking it to a foundation acceptable to the permitting body.
- A structural engineer acceptable to a local government could produce a report regarding how the tiny home is anchored to the ground to a satisfactory degree for a building permit.
- A design and filing for wastewater servicing with the health authority is required, on the accountability of a Registered Onsite Wastewater Professional.
- Municipal water service is covered by municipal permitting. For an onsite well, a single dwelling does not need a well permit, but a second dwelling will trigger a need for a well technician or hydrogeologist assessing safety and flow per hour.
- Regarding foundation solutions such as helical piles, reliance can be placed on the structural engineer to meet requirements. A load rating for each pile and a geological survey are performed to design a helical pile foundation.
- The foundation technique could affect the affordability of tiny homes, with four piles for a secure foundation, if not load bearing, costing roughly \$6,000.
- *Site-built tiny homes bring more challenges, with individual builds difficult to certify.*
- Whose responsibility would it be to inspect and certify a tiny home that is already built? In one case, Mint Tiny Homes connected with home buyers from a builder that had gone under, and finished some partly built homes, finding that certification with Intertek in this case was prohibitively costly and difficult.
- *In light of the above, for completed site-built homes, there is no realistic path to be certified, as one would have to have photo documentation of every phase of the house being built. The path is to start correctly within the approval process, even if site-built.*

After this exercise, the workshop paused for lunch from 12:45 p.m. to 1:30 p.m.

## AFTERNOON SESSION

### 3. Planning & Siting Considerations

Project Manager Reid introduced the topic, with reference to the case of a family with multigenerational living aspirations experiencing bylaw enforcement upon their recently installed tiny home. Technical Panel discussion included:

- A community's Official Community Plan sets out its vision and values.
- The zoning bylaws and servicing regulations host specifics regarding how one's property is used in its current state.
- Development permits are regulatory and specific in guiding development in areas with environmental sensitivity, or for form and character.
- Zoning bylaws and servicing regulations pinpoint where and how a tiny home on wheels can be utilized.
- Zoning considerations are at the discretion of each local government. Even within a regional district, there can be vast differences between electoral areas.
- Depending on how the bylaw is crafted, a tiny home on a foundation may meet the zoning bylaw definition of a dwelling and therefore go through the building permitting process.
- One potential tool could be a density swap of a smaller primary house footprint for an additional tiny home on a lot.
- If a local government wanted to permit tiny homes on wheels as a form of occupancy, it might look specifically at defining a tiny home on wheels in its bylaws and then making it a permitted use in the zoning bylaw.
- Zoning bylaw amendments might also require an Official Community Plan amendment in order for those two to be congruent.
- If a tiny house could be built on a trailer that is certified to a CSA standard, meets the BC Building Code, and is affixed to a foundation, will it be approved by local government? Zoning regulations and definitions must be met.
- For example, a cottage on North Pender Island is defined as a dwelling with limited floor area that is on a lot where there is another dwelling. A provision in the zoning bylaw would have to allow for a cottage, or a tiny home on wheels.
- The Province is pushing municipalities to allow more secondary suites and to densify (Bill 44). But for land to be suitable, is there a proper buildable footprint with proper access and egress, septic fields, development permit areas in effect, and other ameliorating concerns?
- A health and safety perspective is critical when reviewing projects as part of the permit process, with access for emergency services being a top priority in rural areas.
- Many Islands Trust Area lots are on small water systems and will not accept intensifying use or hookups, and a patchwork of allowed areas on the islands may result.
- *There is a risk tolerance question for elected officials. Saturna Island Local Trust Committee for instance accepts risk in that they have amended their bylaws to allow living in a recreational vehicle, as long as it is serviced.* Perhaps this is a time-limited issue while efforts go into building non-market and other affordable modes of housing.
- Most local governments allow ADUs, but some have seen inquiries for tiny home cooperative villages with more intensive land use, and in a rural area there are considerations around that intensity.
- Minimum sizes for ADUs have been traded for size maximums in many regulatory jurisdictions.

- Does a certified tiny home put on a helical pile foundation become a building by definition? Due diligence needs to be applied to ascertain if the local zoning regulation allows a secondary dwelling from a density perspective.
- Sprawl is costly, and the provincial government wants growth and density in the right places to be sustainable long term from a servicing perspective. Something that can be moved on and off the lot easily may be a desirable option to address these concerns.
- Flexibility exists in zoning bylaws and local regulations to suit each community, and location- specific guidance will be mandatory.

**Best Practices for Integrating Tiny Homes on Wheels into Bylaws:**

- There is a drive to get this to work, in one jurisdiction, for a benchmark model on zoning, inspection, and servicing.
- The initial hurdle of categorical rejection on the basis of being a tiny home on wheels is the hurdle to surpass, and once it is demonstrated conclusively in a jurisdiction, then more may follow suit through bylaw amendments.
- *In the case of Islands Trust, each Local Trust Committee has unfettered authority to amend its bylaws.*
- *If a land use bylaw needed to be amended, direction to planning staff from the Local Trust Committee could occur to examine amendments which enable tiny homes on wheels.*
- Each individual Local Trust Committee’s land use bylaw(s) would need an amendment, and each must be looked at separately in its own context, because for instance some LTCs’ bylaws are less specific about what constitutes a dwelling.
- A model (templated) bylaw including a definition of tiny homes on wheels could be designed for each Local Trust Committee to have a place to begin this discussion.
- A model or pilot project could demonstrate a pathway for other jurisdictions to follow.
- For a pilot project, integration between RDN building inspection and planning services under the same local government is a conducive environment. On the southern Gulf Islands, Islands Trust would require collaboration with CRD Building Inspection, which is an authority external to Islands Trust not currently involved in this project.
- *There is a need for education of building officials, through channels such as the Building Officials’ Association of BC, their Annual Conference, and Lunch + Learns, to familiarize inspectors and officials with the issues related to tiny homes on wheels.*
- *Planners have a peer learning network through the Planning Institute of BC. RPPs are members, and this could present an excellent opportunity to present how tiny homes on wheels can meet requirements.*
- The need for more housing, rentals, and affordability, creates a situation where municipalities and local governments may be able to identify suitable areas.
- If tiny homes on wheels can be approved, then local governments can demonstrate how this will help meet community housing needs in their Housing Needs Reports and OCPs.
- The Islands Trust Housing Options Toolkit is a good example of a framework provided to Local Trust Committees, and then they can discuss and prioritize as it suits their constituencies.

**4. Designation, Water, and Insurance**

- Registered Onsite Wastewater Professionals and Island Health manage wastewater, up to a certain literage for ROWPs.

- Inspection responsibility was shifted from health authorities to these professionals in 2005.
- The health authority seeks assurance that any system installed will not be a detriment to health and that it meets the parameters of the Sewerage System Standard Practices Manual. After design and installation, a permit is given for two years while it is reviewed, approved, and filed by the health authority, and if there are issues with the system, responsibility is assumed by the wastewater professional.
- Whether the structure in question is a tiny home or a mansion, the health authority wants to know that a system is adequate and is the responsibility of a wastewater professional to design appropriately with regard to riparian zones, setbacks, and wells.
- ROWP tests flows, soil samples, percolation tests, sites septic components and other elements of servicing.
- Wastewater systems including composting toilets and grey water are part of Sewerage System Standard Practices Manual since 2016.
- Potable water: if there is a chlorinated municipal source, then it is a matter of ensuring you meet plumbing codes for service, which is certified through plumbing inspection.
- Dealing with a non-municipal source such as well or rainwater and if it is a sole source, proof of potable water with a test will be required.
- Two dwellings (including a part-time or recreational cottage) sharing a single water source is considered a small water system and necessitates interface with the Drinking Water Protection Regulation and Drinking Water Officer's Guide. The health authority gives an operating permit and testing regime.
- A single dwelling will be subject to the regulations of local government. *Water systems for tiny homes on wheels do not have to come through the main dwelling's system.*
- A key consideration is that potable water certified materials are used with regard to off-grid potable water harvesting and rainwater catchment, such as roofing and conveyance materials.
- If the house is connected to municipal water and the smaller dwelling is an independent rainwater harvesting system that is not connected, a back flow preventer is required.
- City water is easier because of chlorination, but meeting code comes down to proper horizontal separation of pipes.

## 5. Developing a Regulatory Framework Roadmap

- Tiny homes on wheels are to be certified under the CSA Z240 MH standard or CSA A277 modular home standard.
- CSA Z240 MH definition: a home built on a steel frame, subject to third party inspection.
- CSA A277 definition: a modular home built to planned standards requiring BC Building Code compliance.
- By meeting the BC Building Code, tiny homes on wheels are brought into standard local government approval processes, and then consideration is given to site-specific elements: preliminary work for siting, servicing, and geohazards in the normal course of receiving a building permit.
- Prescriptive guidance for foundation and tie-down options is required.
- *From an inspection standpoint, the willingness to inspect tiny homes on wheels and issue permits will require an educational and outreach effort to building officials and departments.*
- When these prerequisites are in place, zoning authorities such as Local Trust

Committees can review local bylaws and definitions therein to ensure that tiny homes on wheels are permitted by zoning; or amend zoning bylaws and OCPs if necessary.

- Local governments should consider directing staff to draft standard provisions that could be applied when considering zoning bylaw amendments.
- Persistent misinformation and confusion around tiny homes on wheels can be informed by local governments providing verified information.
- Engagement between industry and local government is required, discovering pinch points and demonstrating a path to which builders can respond.
- Advocacy with provincial decision-makers and communication of successes is critical.
- Meeting certification standards and being within the permitting process means it is easier to access traditional lending for tiny homes on wheels.
- A builder reports that financing is often done through RV loans at a higher rate from less conventional lenders. Financial institutions who will loan for and insure a CSA Z240 MH should insure a tiny home on wheels as described.
- It is important to understand the distinction between “certifiable” or “legal” tiny homes on wheels versus site-built or DIY tiny homes, which could also be viewed as “increased liability” tiny homes.
- There is recognition that RVs and other such ad hoc dwellings are being used in the Islands Trust Area and elsewhere, but already-built dwellings will be extraordinarily difficult to be certified by Intertek or QAI under the CSA standards identified.

#### 6. Next Steps and Task Assignment

- This project is completed at the end of March, with the final report produced by March 28 to submit to the Tiny Homes on Wheels Project Steering Committee.
- There will be one more round of discussion for Technical Panel members with the Project Manager. He will solicit any suggested changes to the final report.

#### ADJOURNMENT

The workshop adjourned at 3:50 p.m.

Certified Correct:

Rob Kroeker

Rob Kroeker, Planning Services Administrative Assistant / Recorder

## Appendix H: NOAH Remote Inspection Information

The National Organization of Alternative Housing (NOAH) Inspections is a prominent third-party inspection service designed to ensure the safety and code compliance of tiny homes, particularly those built on trailers (THOWs). NOAH provides a remote inspection process, leveraging technology to streamline the verification of construction standards. This system has gained traction within the North American tiny home community, offering builders and owners a means of demonstrating the quality and integrity of their dwellings.

NOAH's inspection process typically involves a combination of document review, photographic and video evidence, and, in some cases, virtual or on-site inspections. Builders submit detailed plans, specifications, and construction documentation to NOAH, which are then reviewed by certified inspectors. The use of digital tools allows for the efficient transmission and evaluation of this information, reducing the need for extensive travel and on-site assessments. This remote capability is particularly advantageous for builders located in remote areas or those seeking to minimize inspection costs.

The NOAH inspection covers a range of critical building components, including structural integrity, electrical systems, plumbing, heating, ventilation, and fire safety. Inspectors verify that the construction adheres to relevant building codes and industry standards, ensuring the safety and habitability of the tiny home. Upon successful completion of the inspection, NOAH issues a certification, which serves as a testament to the home's compliance with established standards. This certification can be valuable for insurance purposes, financing applications, and resale transactions.

A significant aspect of the NOAH system is its focus on American National Standards Institute (ANSI) standards, specifically ANSI A119.5 for recreational park trailers and ANSI 119.2 for recreational vehicles. These standards are widely recognized and accepted in the United States, providing a framework for the safe construction and operation of recreational vehicles and park model tiny homes.

**However, it is crucial to note that NOAH certifications, being primarily based on ANSI standards, are not directly applicable or compliant with Canadian building codes and regulations.** Canada has its own set of national and provincial building codes, which may differ significantly from ANSI standards. For example, the National Building Code of Canada (NBCC) and provincial variations like the British Columbia Building Code (BCBC) establish specific requirements for structural design, electrical systems, plumbing, and fire safety.

Consequently, while a NOAH certification may indicate a high level of construction quality, it does not guarantee compliance with Canadian regulations. Tiny home builders and owners in Canada must ensure that their dwellings meet the requirements of the applicable Canadian building codes and obtain necessary permits and approvals from local



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authorities. Reliance on NOAH certification alone may lead to regulatory issues and potential safety hazards.

In summary, the NOAH remote inspection system offers a valuable service for verifying the quality and code compliance of tiny homes within the American context. However, due to the divergence between ANSI and Canadian building standards, NOAH certifications are not a substitute for compliance with Canadian regulations. Builders and owners in Canada must prioritize adherence to national and provincial building codes to ensure the safety and legality of their tiny homes.

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