

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 18-0016

INTERPRETATION

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Interpretation Date:	November 26, 2019
Building Code Edition:	BC Building Code 2018
Subject:	Accessibility clearances for dwelling unit entrance doors, in apartment buildings
Keywords:	Apartments, accessibility, dwelling unit entrance, door clearances, power operated doors
Building Code Reference(s):	3.8.2.1.(1)(a), 3.8.2.1.(1)(b), 3.8.2.1.(2), 3.8.2.12, 3.8.3.6.(6), 3.8.3.6.(11), 3.8.5.3.(1)(a), 3.8.5.3.(3).

Question:

1. For apartment buildings, Clause 3.8.2.1.(1)(b) sets out the scope of required accessible path of travel from the building entrance(s). Are the unit entrance doors (typically swinging into the unit) also required to meet the accessible clearance requirements of Sentence 3.8.3.6.(11) for the following:
 - a) Standard dwelling units (not designed to be accessible or adaptable)
 - b) Adaptable dwelling units
 - c) Sleeping Rooms other than Hotels
 - d) Hotel suites
 - e) Dwelling units within apartment buildings, that are designed to be accessible
2. If a dwelling unit entrance door does require the clearances of Sentence 3.8.3.6.(11), and these cannot be provided, is it acceptable to provide a power operated door?
3. If the answer to question 2. above is yes, must the power operated door comply with all the provisions of Sentence 3.8.3.6.(6)?

Interpretation:

1.a) No.

Clause 3.8.2.1.(1)(b) requires an accessible path of travel from accessible entrance(s) of the building throughout common areas, to parking areas, and passenger loading zones. Elevation changes for the common areas are also addressed in this Clause.

However, the dwelling unit entrances themselves are not required to be designed for accessibility, unless the units are required by other regulations or standards to be accessible or adaptable. The



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dwelling unit entrance doors are private and are not considered to be part of the common areas of the apartment building. Therefore the door clearance requirements of Sentence 3.8.3.6.(11) are not applicable for standard dwelling unit entrance doors, unless such dwelling units are required by other regulations or standards to be accessible or adaptable.

1.b) Yes.

Subclause 3.8.2.1.(1)(a)(ii) indicates that adaptable units are subject to Section 3.8. Clause 3.8.5.1.(1)(a) requires 1 storey adaptable units in apartment buildings to comply with Subsection 3.8.5. Clause 3.8.5.3.(1)(a) and Sentence 3.8.5.3.(3) indicate Sentence 3.8.3.6.(11) applies to the path of travel into the adaptable units, including the adaptable unit entrance doors.

1.c) Yes, to 1 in every 40 units or part thereof.

As indicated in Subclause 3.8.2.1.(1)(a)(i) and Sentence 3.8.2.12.(2), where sleeping rooms and bed spaces are provided in residential clubs, schools and colleges, dormitories, 1 in every 40 units or part thereof are required to be designed to Articles 3.8.2.12 and 3.8.3.22. Sentence 3.8.2.12.(2) indicates that such designated units are subject to Subsection 3.8.3. This means the door clearance requirements of Sentence 3.8.3.6.(11) are applicable for the 1 in every 40 units. An illustration of this is provided in Division B Notes to Part 3, A-3.8.3.22.

1.d) Yes, to 1 in every 40 units or part thereof.

Subclause 3.8.2.1.(1)(a)(i) and Sentence 3.8.2.12.(2) indicate that hotel suites (1 in every 40 or part thereof) are subject to Section 3.8. and Subsection 3.8.3. This means the door clearance requirements of Sentence 3.8.3.6.(11) are applicable for the 1 in 40 units. An illustration of this is provided in Division B Notes to Part 3, A-3.8.3.22.

1.e) Yes.

Within apartment buildings, dwelling units that are designed to be accessible pursuant to other regulations or standards, are required to be designed to Articles 3.8.2.12 and 3.8.3.22. Sentence 3.8.2.12.(2) indicates that such units are subject to Subsection 3.8.3. This means the door clearance requirements of Sentence 3.8.3.6.(11) are applicable. An illustration of this is provided in Division B Notes to Part 3, A-3.8.3.22.

2. Yes.

Sentence 3.8.3.6.(11) references Sentence 3.8.3.6.(6) (power operated doors) as an alternative to compliance with Sentence 3.8.3.6.(11).



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3. Yes.

This is an overly onerous requirement for dwelling unit entrance doors, however there are no stated exceptions to the various detail provisions if power operated doors are used as an alternative to compliance with Sentence 3.8.3.6.(11).

Reference 5.2 of CSA B651-12 "Accessible design for the built environment" can be used as an alternative. This however, will not achieve a significantly different result, or substantially reduce the requirements.

As required by Subclause 3.8.3.6.(6)(a)(iv) operating controls must be adjacent to and centred on either the length or the width of a clear floor space of 1350mm by 800mm.

The location of the door opening controls can be located on the wall along the path of travel as one approaches the door, but as required by Subclause 3.8.3.6.(6)(a)(iii), must be not less than 600mm and not more than 1500mm from the door swing.

The explanatory notes A-3.8.3.6.(6) and (7) indicate that where security is required; a key, card, or radio transmitter, meet the intent of the requirement for the power operator to be actuated by a pressure plate.



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