Comments on Single Stair Egress Consultation

I have considered the various papers and discussions on the proposed changes to the codes for Single Stair Egress and have significant concerns with them. These are outlined as follows:

A) It is in my view a false statement that this will increase affordability. Since there are restrictions on height, number of units and increased fire protection in this concept it simply reduces the expense of a second set of stairs allowing for somewhat bigger units. In my view this will make the cost the same or even more. It should not be the raison d'etre for this change.
B) Material differences. Citing or looking to practices in Europe and the UK are not recommended given the differences in construction methods, design, population density, materials and regulatory infrastructure
C) No consideration appears to have been given to the issue of who needs the affordability. These are usually those who are older, not well of financially, may have cognitive and physical disabilities. How would this include or consider their needs. I fear this will allow the building of residences for the better off at the expense of the vulnerable.
D) Enforcement at build and after build are done by the municipalities and that will vary significantly based on the size, knowledge and staffing of the building department.
E) Such a change would mean it is unlikely that the ageing population, especially those with disabilities, would be able to live in these buildings without an increased risk to their safety. Any change should be equitable and inclusive.
F) It seems that this is assumed to be available to all municipalities regardless of any qualification. I suggest that this is really a big city solution only (250,000 or bigger).
G) The consultation on these needs in my view to be much wider and deeper and must involve direct interaction with the user (i.e. the end consumer)
H) I would not want safety to be compromised by using affordability as an out. There are some well known incidents of this in the past that did not turn out good.
I) What consumer's do not want is a Grenfell incident in Canada. I am not sure that this safety issue has been given a thorough run through in Canada. The University of Fraser Valley study(https://blogs.ufv.ca/cpscjr/files/2024/07/Single-Stair-Egress-Report-v-Final_.pdf) does speak to it. I have followed the Grenfell enquiry from the get go and read a lot of the papers on it.

Conclusion
We do not favour this change. A substantial amount of research on the risk and operating issues needs to be carried out and should include studies with the representative demographics of this country. It is also in our view important to listen to and respect those from the fire services who provide us with protection.

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