

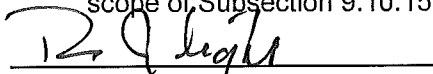
# BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing  
**AIBC, APEGBC, BOABC, POABC**

**File No: 12-0043**

**INTERPRETATION**

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Interpretation Date:	September 16, 2015
Building Code Edition:	BC Building Code 2012 (after December 19, 2014)
Subject:	Limits for exterior openings for dwelling units with secondary suites
Keywords:	Windows, unprotected openings, limiting distance, dwelling units, secondary suites
Building Code Reference(s):	9.37.2.18.(2)(b), 9.10.14.4.(3), 9.10.15.4.(3), 9.10.14.2, 9.10.15.2
<b>Question:</b>	<p>An unsprinklered dwelling unit which includes a secondary suite has a limiting distance to side property lines of over 1.2m, but less than 2m.</p> <ol style="list-style-type: none"><li>1. Which Subsection applies: 9.10.14, or 9.10.15?</li><li>2. Based on Clause 9.37.2.18.(2)(b), Sentence 9.10.14.4.(3) applies. Are the limits for individual unprotected openings applied in all cases of an exterior wall with varying limiting distances along its face, even if some of them are located over 2m away from the property line?</li><li>3. Are the limits in Sentence 9.10.14.4.(3) applied to both sides of the dwelling unit even if the secondary suite is located horizontally only on one side of the dwelling unit?</li><li>4. Are these restrictions applied even to existing dwelling units being renovated to accommodate a secondary suite?</li><li>5. Are the limits in Sentence 9.10.14.4.(3) applied even to an exterior door?</li></ol>
<b>Interpretation:</b>	<ol style="list-style-type: none"><li>1. Subsection 9.10.15 should apply.</li></ol> <p>It is recognized that it is intended that the spatial separation exposure protection approach for dwelling units with secondary suites should not be any different from that for individual dwelling units. It is expected that this will be better clarified in the next edition of the Building Code. Refer also to previous BC Building Policy Branch Bulletin No. B07-04 "Spatial Separation for Buildings Incorporating a Secondary Suite", copy attached.</p> <p>It is noted that the NBCC 2010 explicitly includes a dwelling unit with a secondary suite in the scope of Subsection 9.10.15.</p> <p> R. J. Light, Committee Chair</p>
<p>The views expressed are the consensus of the joint committee with members representing AIBC, APEGBC, BOABC, and POABC, which form the BC Building Code Interpretation Committee. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local <i>Authority Having Jurisdiction</i>. The views of the joint committee should not be construed as legal advice.</p>	

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Note that per the definition of a secondary suite, Section 9.37 applies only to a building of residential occupancy having only one other dwelling unit.

2. It is recognized that it is intended that the spatial separation exposure protection approach for dwelling units with secondary suites should not be any different from that for individual dwelling units. In this case the more appropriate reference should actually be 9.10.15.4.(3), and the Subsection 9.10.15 approach allowing separate portions of the exposing building face to be used for the purposes of separately determining percentages of openings permitted, would be appropriate. It is expected that this will be better clarified in the next edition of the Building Code. Refer also to previous BC Building Policy Branch explanatory bulletin No. B07-04 "Spatial Separation for Buildings Incorporating a Secondary Suite", copy attached.
3. Yes.  
Currently there is no distinction made in the Building Code as to which side of the building the secondary suite is located, for spatial separation or exposure protection purposes. In this case the more appropriate reference should actually be 9.10.15.4.(3).
4. Yes.  
There is no distinction made between new or existing buildings in Section 9.37.
5. No.  
It is recognized that it is intended that the spatial separation exposure protection approach for dwelling units with secondary suites should not be any different from that for individual dwelling units. The more appropriate reference should be 9.10.15.4.(3). This sentence addresses "glazed openings" as opposed to "unprotected openings". It is expected that this will be better clarified in the next edition of the Building Code.



R. J. Light, Committee Chair

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## Information Bulletin

Building Policy Branch  
Office of Housing and Construction Standards  
PO Box 9844 Stn Prov Govt  
Victoria BC V8W 9T2  
Email: [building.policy@gov.bc.ca](mailto:building.policy@gov.bc.ca)  
Website: [www.housing.gov.bc.ca/building](http://www.housing.gov.bc.ca/building)

No. B07-04  
April 18, 2007

### TO: ALL BUILDING OFFICIALS Spatial Separation for Buildings Incorporating a Secondary Suite

Specific provisions for Secondary Suites were introduced into the British Columbia Building Code (BCBC) in 1995. It was subsequently determined that a residential building that included a *secondary suite*, as defined in the Code, would be exempt from prescribed requirements for the construction of an exposing building face provided other specified requirements were met. These other specified requirements for the construction of an exposing building face were similar to those of a house or a residential building where there is no dwelling unit above another. This exemption was applicable regardless of the *secondary suite* orientation to the primary residential unit (i.e. whether vertically or horizontally adjacent).

With the adoption of the 2006 BC Building Code there was no intention to change this approach from the previous Code for buildings which include a *secondary suite*.

Sentence 9.36.2.19.(1) Division B of the 2006 BCBC should read:

1. Except as required in Article 9.10.15.3., in *buildings* which contain a *secondary suite*, the requirements of Article 9.10.14.5. do not apply provided
  - a) the *exposing building face* has a *fire resistance rating* of not less than 45 min where the limiting distance is less than 1.2 m, and
  - b) where the *limiting distance* is less than 0.6 m the *exposing building face* is clad with *non-combustible* material.

The change of reference from Article 9.10.15.5. to Article 9.10.14.5. in Sentence 9.36.2.19.(1) is considered to be an errata and will not require a formal revision to the Code through a Minister's Order.

Please contact the Building Policy Branch should you require further clarification on this matter.

Building Policy Branch,  
Office of Housing and Construction Standards

*The contents of this Bulletin are not intended to be provided as legal advice and should not be relied upon as legal advice. For further information contact the Building Policy Branch.*