

# BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing  
**AIBC, EGBC, BOABC**

**File No: 24-0105**

**INTERPRETATION**

**Page 1 of 2**

Interpretation Date:	June 17, 2025
Building Code Edition:	BC Building Code 2024
Subject:	Application of Part 3 Spatial Separation Requirements to a Part 9 Townhouse Building
Keywords:	Dwelling Unit, Spatial Separation, Exposing Building Face
Building Code Reference(s):	9.10.15.4.(1)

## **Question:**

The allowable area of glazed openings in the exterior building face of a Part 9 building consisting entirely of non-stacked townhouse units with no other type of occupancy can be determined in accordance with the requirements of Part 3. In that case, is the exposing building face also required to comply with other spatial separation requirements of Part 3 such as construction requirements and fire-resistance ratings?

## **Interpretation:**

No.

Subsection 9.10.15 applies to buildings that contain only dwelling units and have no dwelling unit above another dwelling unit. Sentence 9.10.15.4.(1) states 3 acceptable methods of determining the maximum aggregate area of glazed openings in the exposing building face. One of these methods, in Clause (b), is conformance with Subsection 3.2.3. That Subsection includes requirements for the maximum area of unprotected openings in an exposing building face, but it also includes requirements based on that allowable area, including for the fire-resistance rating and the type of construction and cladding.

However, Sentence 9.10.15.4.(1) refers to Subsection 3.2.3 only for the area of glazed openings, not for any other requirements that may be applicable to an exterior wall. The title of Article 9.10.15.4 (Glazed Openings in Exposing Building Face) indicates that this Article deals only with the glazed openings.



Patrick Shek, P.Eng., CP, FEC, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. 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 *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

# BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing  
**AIBC, EGBC, BOABC**

**File No: 24-0105**

**INTERPRETATION**

**Page 2 of 2**

For this type of building, the construction of the exposing building face is regulated by Article 9.10.15.5, which does not refer to Subsection 3.2.3. The type of construction and cladding, and the fire-resistance rating, are required to conform to Article 9.10.15.5, not to Subsection 3.2.3.

Interpretation 12-0091 also addressed application of Part 3 spatial separation requirements to a Part 9 building, with respect to the conditions under which the limiting distance is halved. That interpretation includes the statement that “all relevant requirements of Subsection 3.2.3 are applicable.” The important word in this statement is “relevant”. This was intended to refer to requirements that affect the allowable area of unprotected openings, not to all requirements of Subsection 3.2.3. Interpretation 24-0105 is consistent with Interpretation 12-0091.

This question was submitted with respect to requirements of the BCBC 2018. This interpretation references the BCBC 2024 because the 2024 edition is the current Code and the applicable requirements have not changed between these 2 editions.



---

Patrick Shek, P.Eng., CP, FEC, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. 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 *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.