

BÜRO47architecture inc

4777 Delta Street
Delta BC V4K 1V7

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July 22, 2025

Residential Suite Conversion Code Compliance

Re: Development Application at:
4872 Delta Street, Delta, BC

City of Delta Development Department
To whom it may concern,

Staff has requested a letter confirming the Building Code implications of converting a portion of the rear of the two commercial units into two residential suites at the above noted address, should Development Approvals be granted to this proposal.

First, I can confirm that our office completed a high-level Building Code review of the proposed renovation prior to making a Development Application to the City of Delta. With that review we had determined that the proposed residential suites would be able to be constructed in a Code-compliant fashion with some relatively modest upgrades and changes. We believe that the existing building could be adapted, and that the work required would not render the proposition of residential suites uneconomical or unviable.

While we maintain this position, it is important to note that we in no way intend to suggest that the existing construction of the commercial suites - as observed at our Final Review and for which an Occupancy Permit was granted - are fit to be used 'as-is' for any use other than the intended commercial occupancy type. Changes and/or upgrades to the as-constructed conditions would be necessary in order to change the occupancy type.

Some important considerations about Code compliance for a commercial-to-residential conversion:

1. A rigorous Code analysis will be required if the Development Application is approved, and the Owner chooses to proceed to a Building Permit application for the renovations.

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- a. The technical design development, as would be necessary leading up to a Building Permit application, is the ordinary juncture at which a more detailed review of Building Code is undertaken to ensure that the design meets Code in all respects.
 - b. In this case, some additional on-site documentation, or destructive testing and review of previously constructed elements, will likely be required by the City of Delta or registered professionals as part of a detailed Code review. Logically that would occur prior to the submission of Building Permit documents, but may also be required during the course of construction to satisfy registered professionals or municipal inspectors.
2. The residential suites represent a change in Building Code occupancy type for a portion of the building, so it is very likely that the City of Delta will require a thorough analysis documenting any impact on building classification as a whole, construction types, assembly ratings, etc. This would need to go beyond what would ordinarily be required for a simple renovation.
 - a. Note that many of the as-constructed Level 1 walls are already protected to 2h FRR even where fire separations were not previously required. All load bearing elements at that floor were required to be protected to 2h FRR given the 2h FRR fire separation rating on the Level 2 floor. The site is well positioned to ensure that all residential spaces are separated from all commercial spaces by a 2hr FRR fire separation without extensive fire rating upgrades.
3. While it is alluded to above, all required fire separations between uses, between suites, and at service or utility rooms will be specified in a Building Permit Application to meet Code, and then subsequently reviewed on site to confirm that the construction (whether existing or upgraded) does in fact achieve the required ratings. We do not see any concerns with achieving the required fire separations through the course of renovations.
4. The original building was designed under BCBC 2018. The new work would be reviewed under the BCBC 2024. It is unknown at this time if the City or registered professionals would require any adjustments/upgrades to the

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upper levels in light of this transition, however it is not common to undertake upgrades beyond the in-scope area of a renovation.

5. The original building was designed as a Part 3 building, but the building that would come in with a BP for the residential suites would align with Part 9. It is our opinion that the entire building may therefore need to be transitioned to Part 9. We would expect that the City of Delta would require that a Code Consultant or Architect be retained in support of a Building Permit to review the existing building in light of this transition, to ensure that Code-compliance is achieved at the renovated portion. The most obvious implication to this transition would be that all upper level bedrooms would need to be confirmed to have egress compliant windows that were otherwise not required under Part 3.
6. The residential suites themselves will need to be demonstrated to support safe egress. Most notably, if the building is considered Part 9 going forward, each bedroom or combination bedroom (as is relevant to the studio suite) will require egress windows from the new suites.
 - a. The window in the 1 bedroom suite's bedroom can be egress compliant.
 - b. There is no space for an egress window in the studio suite because there is a glazed exit door. The City of Delta may require an Alternative Solution for this condition, but it is plain that an exit door exceeds the life-safety offered by an egress window.
7. The fire alarm will need to be configured and re-verified to support the residential suites. This should not be a concern, given the annunciator panel model that is installed.
8. City of Delta Development Dep't Staff have identified concerns with amount of light and fresh air available to the new suites:
 - a. While there is limited exterior wall area available to the proposed suites, both suites have at least one glazed opening (studio suite has 1, one bedroom suite has 2). As in all projects, code compliant electrical lighting will be required at the interiors in addition to the daylight provided by glazed openings.

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- b. Fresh air is required by Code to be provided with a compliant ventilation system (typically an HRV or ERV). Code compliant heating, ventilation, and air conditioning systems would need to be proposed and constructed.
9. Code compliance, in all respects, would be verified in construction and assured to the City of Delta with Letters of Assurance.

The above is not meant to be exhaustive, but identifies some key Code compliance considerations. It is our opinion that the proposed suites can be constructed to meet Code.

Finally, it is important to reiterate that Code compliance of the proposed Development Application is possible, but not yet achieved on Site. The Developer will need to apply for a Building Permit, but will not be permitted to until they have met the City's conditions and have received an approved Development Application. At that point, a thorough Code analysis must be completed to demonstrate that the renovation, in all respects, will meet Code. During construction, that code-compliant design will need to be delivered on site prior to Occupancy.

Sincerely,



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