



COUNCIL REPORT

Report Date: June 25, 2024
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RTS No.: 16445
VanRIMS No.: 08-2000-20
Meeting Date: July 9, 2024
[Submit comments to Council](#)

TO: Vancouver City Council
FROM: General Manager of Development, Buildings and Licensing
SUBJECT: Sprinkler Upgrade Exemption to Advance Progress Toward 3-3-3-1 Permitting Targets

Recommendations

THAT Council approve, in principle, amendments to the Building By-law generally in the form attached as Appendix A, to institute a minimum threshold for the sprinkler upgrades in existing residential buildings;

FURTHER THAT the Director of Legal Services be instructed to prepare the necessary amending by-law generally in accordance with Appendix A.

Purpose and Executive Summary

This report seeks Council's approval to change the methodology for how the City determines if a renovation triggers the requirement to install sprinklers by instituting a minimum threshold.

Construction costs have increased considerably in recent years meaning more renovation projects hit the threshold requiring sprinkler installation. This can add as much as 20% to the cost of a renovation and trigger additional reviews, lengthening permit timelines.

The changes recommended in this report would establish a minimum threshold of \$250,000 project value to require a sprinkler upgrade, as compared to the detailed, complex, and time-consuming methodology that is currently in place to determine if a sprinkler upgrade is required.

If approved by Council, these changes will go into effect immediately upon bylaw enactment.

Council Authority/Previous Decisions

The Vancouver Charter provides Council with the broad authority to regulate the construction of buildings, including structures of every kind, excavations, and everything so attached to a structure as to constitute real property.

On July 19th, 2019, Council enacted Building By-law 12511 regulating the construction of Buildings and related matters in the City of Vancouver, pursuant to the authority in Section 306. of the Charter, which provides the specific authority for Council to make building regulations in the form of Building By-laws.

City Manager's Comments

The City Manager concurs with the foregoing recommendations.

Context and Background

To speed up home renovation permits and move towards Council's 3-3-3-1 approval framework, staff have been reviewing upgrade triggers and where appropriate aligning all relevant renovation upgrade triggers to a \$250,000 project value threshold.

For example, in December 2023, Council approved increases to the sewer and water connection upgrade threshold from \$95,000 to \$250,000, and in June 2024, Council approved an increase of energy upgrade triggers to \$250,000. These changes have had a substantial impact on improving home renovation permit processing times, which are down by 50% year-to-date 2024 as compared to 2023.

Exempting permits under \$250,000 from building upgrades and additional reviews, has had a significant impact on permitting times for simple home renovation permits, with processing times down by 50% year-to-date 2024 compared to 2023.

Discussion

This current report proposes the establishment of a minimum threshold of \$250,000 project value to require a sprinkler upgrade, as compared to the detailed, complex, and time-consuming methodology that is currently in place to determine if a sprinkler upgrade is required. It is anticipated that this change will substantially improve permit processing times for home renovations, allowing approximately 10% more permits to be processed in 3 days.

The requirement for sprinkler upgrades for buildings presently in the Building By-law are intended to address City fire safety, life safety, and resiliency objectives. Sprinklered buildings have significantly better life safety outcomes and are much more likely to reduce the risk of fire spread to adjacent building or properties.

The proposed set of revisions in provided in Appendix A will refine existing sprinkler upgrade trigger requirements, recognizing that:

1. The cost to sprinkler buildings or substantive portions of buildings that do not already have sprinklers can be a significant barrier to renovation.
2. Where the scope of proposed renovation is small and does not change fundamental building characteristics, the change in risk is not substantive.
3. The existing triggers for sprinkler upgrading can be unclear for certain scopes of work.

This proposal will simplify the existing sprinkler upgrade triggers for residential buildings, making it more practical and predictable for most small-scale home renovation projects. It is anticipated that this change will make approximately 10% more home renovation permits eligible for processing in 3 days.

Financial Implications

There are no financial implications associated with this report's recommendations.

Legal Implications

There are no legal implications associated with this report's recommendations.

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APPENDIX A: DRAFT BY-LAW TO AMEND BUILDING BY-LAW NO. 12511 REGARDING A MINIMUM THRESHOLD FOR SPRINKLER UPGRADES

This document is being provided for information only as a reference tool to highlight the proposed amendments. The draft amending by-laws attached to the Council report RTS No. 16445 entitled Sprinkler upgrade exemption to advance progress toward 3331 permitting targets represent the amendments being proposed to Council for approval. Should there be any discrepancy between this redline version and the draft amending by-laws, the draft amending by-laws prevail.

THE COUNCIL OF THE CITY OF VANCOUVER, in public meeting, enacts as follows:

1. This by-law amends the indicated provisions of Building By-law 12511.
2. In Article 11.2.1.3. of Division B of Book 1, Council:
 - (a) in Sentence (1), strikes “Sentence (2)” and substitutes ‘Sentences (2) and (4),’.
 -
 - (b) adds a new Sentence (4) as follows:
 -
 - “**4) A building** need not be *sprinklered* in accordance with Sentence (1), if the *construction* value of the *alteration* does not exceed \$250,000.”.
 -
 - (c) strikes out Table 11.2.1.3. including the Notes to Table 11.2.1.3 and substitutes the following:
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**“Table 11.2.1.3.
Sprinkler Installation Determination Where Dwelling Units are Added
Forming part of Sentence 11.2.1.3.(1),(2), and (3)**

Existing Dwelling Units	New Dwelling Units Added Over Any 5 year Period ⁽¹⁾				
	1	2-3	4-5	6	>6
0-1	Spr R ⁽²⁾	Spr R	Spr R	Spr R	Spr R
2-4	-	Spr R	Spr R	Spr R	Spr R
5-10	-	-	Spr R	Spr R	Spr R
11-20	-	-	-	Spr R	Spr R
>20	-	-	-	-	Spr R

Notes to Table 11.2.1.3.:

- (1) The creation of dwelling units over the previous 5 years from the date of the proposed building permit application.
- (2) Sprinklers Required.”.

3. In Article 11.2.1.4. of Division B of Book 1, Council:
 - (a) strikes out Sentence (3) and substitutes the following:
 -
 - “
 - 3) Except as permitted by Sentence (4), where an *alteration* is made to an existing residential *building* containing not more than two principal residential *dwelling units*, a *sprinkler system* shall be installed**

- a) throughout the *building*, where more than one *dwelling unit* is created, reconstructed, or both,
- b) throughout any *storey* on which a new principal *dwelling unit* is created and all *storeys* below, or
- c) throughout any *storey* on which an *alteration* to the *building* increases the aggregate area of an existing *dwelling unit* by more than 50% of the existing floor area.”; and

- (b) adds a new Sentence (4) as follows:

“

4) A *building* need not be *sprinklered* in accordance with Sentence (3), if the *construction* value of the *alteration* does not exceed \$250,000.”.

4. In Book I, Division B, Council strikes out Note A-11.2.1.4.(3)(a) Replacement Value.

- 5. This by-law is to come into force and take effect on the date of its enactment.

ENACTED by Council this _____ day of _____, 2024

Mayor

City Clerk

APPENDIX B: REDLINE OF CHANGES TO 2019 BUILDING BY-LAW

11.2.1.3. Sprinkler Installation Requirements for the Addition of Dwelling Units in Multi-family Buildings

(See Note A-11.2.1.3.)

1) Except as provided in Sentences (2) and (4), and Sentence 11.2.1.4.(3), where an alteration to an *existing building* creates or adds one or more *dwelling units*, the *building* shall be *sprinklered* in conformance with Table 11.2.1.3.

2) Where the alteration in Sentence (1) involves the addition of existing *floor area* to an existing *dwelling unit*, and that converted space is greater than 50% of the *floor area* of the original *dwelling unit*, the altered *dwelling unit* shall be considered as a new *dwelling unit* and the *building* shall be *sprinklered* in conformance with Table 11.2.1.3.

3) If sprinklers are required by Table 11.2.1.3., they shall be installed throughout the storey on which the new dwelling unit is to be located and all storeys below the new dwelling unit.

4) A building need not be *sprinklered* in accordance with Sentence (1), if the *construction value* of the *alteration* does not exceed \$250,000.

Table 11.2.1.3.
Sprinkler Installation Determination Where Dwelling Units are Added
Forming part of Sentence 11.2.1.3.(1),(2), and (3)

Existing Dwelling Units	New DUs⁽⁴⁾ Dwelling Units Added Over Any 5 year Period ⁽¹²⁾				
	1	2-3	4-5	6	>6
0-1	Spr R ⁽²³⁾	Spr R	Spr R	Spr R	Spr R
2-4	-	Spr R	Spr R	Spr R	Spr R
5-10	-	-	Spr R	Spr R	Spr R
11-20	-	-	-	Spr R	Spr R
>20	-	-	-	-	Spr R

Notes to Table 11.2.1.3.:

⁽⁴⁾ ~~Dwelling Units~~

⁽¹²⁾ The creation of dwelling units over the previous 5 years from the date of the proposed building permit application.

⁽²³⁾ Sprinklers Required.

11.2.1.4. Upgrade Requirements for a Residential Building Containing not more than Two Principal Dwelling Units

[...]

3) Except as permitted by Sentence (4), where an *alteration* is made to an existing residential *building* containing not more than two principal residential *dwelling units* ~~that creates one or more new principal dwelling units or increases the size of an existing dwelling unit~~, a *sprinkler system* shall be installed

a) throughout the *building*, where more than one *dwelling unit* is created, reconstructed, or both ~~where the construction value of an alteration exceeds 50% of the replacement value of the existing building~~,

(See Note A-11.2.1.4.(3)(a).)

b) throughout any *storey* on which a new principal *dwelling unit* is created, and all *storeys* below, or

c) throughout any *storey* on which an *alteration* to the *building* increases the aggregate area of an existing *dwelling unit* by more than ~~and the converted space is greater than~~ 50% of the ~~existing~~ floor area ~~of the original dwelling unit~~.

4) ~~A building need not be sprinklered in accordance with Sentence (3), if the construction value of the alteration does not exceed \$250,000.~~

Notes to Part 11

[...]

A-11.2.1.3. Sprinkler Installation Determination Where Dwelling Units Are Added.

Table 11.2.1.3. provides a matrix that determines sprinkler upgrades for existing unsprinklered or partially sprinklered buildings. The location of the newly created dwelling unit will determine the extent of the sprinkler coverage for the subject building.

A-11.2.1.4. & 11.2.1.11. Project Value. The term “construction value” refers to the value of the proposed work stated on the application for the permit established by Division C, Article 1.6.2.3. This includes the current monetary worth of all labour and all fees and costs incurred for design, investigative testing, consulting services, construction, construction management, contractor’s profit and overhead, sales taxes, and construction insurance related to the building, including all components of the building, and the market value of all labour, including unpaid labour provided by an owner or volunteer, and the market value of all materials, including donated, recycled or used materials.

~~**A-11.2.1.4.(3)(a) Replacement Value.** The term “replacement value” is used as a baseline for determining the applicability of specific upgrade requirements. The term refers to the cost to replace the structure in its current state or serve the function of a previous structure. This is similar to the insurable value – the cost to replace the destructible improvements of a property (as applied to a building or part thereof). This is not intended to be an assessment of the construction, planning, and ancillary costs that could be incurred if the structure in question was built as a reproduction of the original or redeveloped as new construction.~~