Ontario Building Code Requirements for Places of Worship

A Plain-Language Guide for Church Building Committees

CHURCH BUILDING CLASSIFICATION

Group A, Division 2 | OBC 3.2.2.24 / 3.2.2.25

Assembly occupancies not elsewhere classified — applies to virtually all church buildings in Ontario

Prepared by Hawkey Church Management Inc.

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This guide is intended as a general reference for church building committees and does not constitute legal or professional engineering advice. Always consult qualified professionals and your local Chief Building Official for project-specific code interpretations.

"Building together under His direction to accomplish His purpose"

1. Introduction

The Ontario Building Code (OBC) is the regulatory framework that governs how buildings are designed, constructed, and renovated in the province. For church building committees embarking on a new construction project, a major renovation, or even a modest addition, understanding the OBC is not optional—it is essential. The Code determines everything from how thick your walls must be to how many exits your sanctuary needs, from fire alarm requirements to accessibility standards.

Many building committees discover code requirements only after designs are underway, leading to costly redesigns and project delays. This guide aims to prevent that by giving you a clear, plain-language overview of the key OBC provisions that apply to places of worship. Armed with this knowledge, your committee will be better positioned to ask the right questions, evaluate architectural proposals, and make informed decisions throughout your building project.

The single most important thing your committee needs to understand is your building's **occupancy classification**. Under the OBC, church buildings are classified as **Group A, Division 2** occupancies. This classification drives virtually every other code requirement—from construction type and fire protection to exiting and accessibility. The two subsections that apply to most church projects are **OBC 3.2.2.24** (buildings up to 2 storeys and 2,400 m²) and **3.2.2.25** (1-storey buildings up to 600 m²).

> **HCMI TIP:** Before your first meeting with an architect, ensure every committee member understands that your church is a **Group A, Division 2** occupancy. This single fact shapes your entire project. Bring this guide to your initial design meetings.

2. Occupancy Classification

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The OBC organizes all buildings into occupancy groups based on how the building will be used. Group A covers **Assembly Occupancies**—buildings where people gather in significant numbers. Group A is further divided into sub-categories:

Division	Description	Examples
A-1	Assembly occupancies intended for the production and viewing of performing arts	Theatres, concert halls, opera houses
A-2	**Assembly occupancies not elsewhere classified in Group A**	**Churches, mosques, synagogues, temples, community halls, banquet halls, libraries**
A-3	Assembly occupancies of the open-air type	Grandstands, outdoor stadiums, tent structures
A-4	Assembly occupancies in which occupants are gathered in the open air	Amusement park structures, reviewing stands

As shown above, **places of worship fall squarely into Group A, Division 2**. This is not a grey area—the OBC is explicit. Whether your congregation has 50 members or 500, whether you meet in a traditional sanctuary or a modern multi-purpose worship space, your building is an A-2 assembly occupancy.

Why Classification Matters

Your Group A, Division 2 classification is the single most consequential determination in your project. It dictates:

- **Construction type** — the materials permitted for structural elements, floors, and roofs
- **Fire-resistance ratings** — how long structural elements must withstand fire
- **Maximum building area and height** — how large your building can be without additional fire protection
- **Sprinkler and fire alarm requirements** — the level of active fire protection needed
- **Exiting requirements** — the number, width, and configuration of exits
- **Occupant load calculations** — how many people your building is deemed to hold
- **Accessibility requirements** — barrier-free design obligations

> **HCMI TIP:** Some architects may have more experience with residential or commercial (Group D) buildings than assembly occupancies. Ensure your architect is experienced with **Group A, Division 2** requirements—the code demands for assembly buildings are significantly more stringent than for offices or retail.

3. OBC Subsections 3.2.2.24 and 3.2.2.25

The vast majority of church building projects in Ontario fall under one of two OBC subsections. These subsections specify the construction requirements for **Group A, Division 2** buildings based on their size and height. Understanding which subsection applies to your project is critical for budgeting, design, and scheduling.

Subsection 3.2.2.24 — Up to 2 Storeys, Max 2,400 m²

This subsection covers the majority of mid-sized church construction projects. It applies to Group A, Division 2 buildings that are a maximum of **2 storeys** in building height with a **building area not exceeding 2,400 m²** (approximately 25,800 sq. ft.). Key requirements include:

- **Construction type:** Combustible or noncombustible construction is permitted. Most churches in this category use a combination of wood-frame and steel structural elements.
- **Fire-resistance ratings:** Floor assemblies must have a fire-resistance rating of not less than 1 hour. The building must be of noncombustible construction or the structural elements supporting the assembly must achieve the required rating.
- **Sprinkler requirements:** Buildings in this subsection are required to be **sprinklered throughout** in conformance with NFPA 13 when the building area exceeds 600 m². Sprinklering enables the full 2,400 m² building area.
- **Fire alarm:** A fire alarm system is required, including manual pull stations and audible/visual notification devices throughout.
- **Building area increases:** The maximum 2,400 m² building area is achievable when the building is sprinklered. Without sprinklers, the permitted area is significantly reduced.

Subsection 3.2.2.25 — 1 Storey, Max 600 m²

This subsection provides **less stringent requirements** for smaller church buildings. It applies to Group A, Division 2 buildings that are **1 storey** in building height with a **building area not exceeding 600 m²** (approximately 6,450 sq. ft.). This often covers small rural churches, chapel buildings, and modest community worship spaces. Key requirements include:

- **Construction type:** Combustible construction is permitted throughout. This can significantly reduce construction costs compared to projects under 3.2.2.24.
- **Fire-resistance ratings:** Reduced requirements compared to 3.2.2.24. The roof assembly is not required to have a fire-resistance rating, which simplifies design and construction.
- **Sprinkler requirements:** Sprinklering is generally **not required** for buildings that comply with the 600 m² area limit and the other provisions of this subsection. This represents a significant cost saving.
- **Fire alarm:** A fire alarm system is still required for assembly occupancies with an occupant load exceeding 300 persons.
- **Cost implications:** The combination of combustible construction, reduced fire-resistance ratings, and potential elimination of sprinkler requirements makes this the most cost-effective path for small church projects.

HCMI TIP: If your project is near the 600 m² threshold, carefully consider whether staying under that limit saves enough on sprinklers and construction type to offset the reduced space. HCMI can help you run a cost-benefit analysis comparing the two subsections for your specific project.

Comparison: Subsection 3.2.2.24 vs. 3.2.2.25

Requirement	3.2.2.24	3.2.2.25
Occupancy	Group A, Div. 2	Group A, Div. 2
Max. Storeys	2 storeys	1 storey
Max. Building Area	2,400 m²	600 m²
Construction Type	Combustible or noncombustible (with ratings)	Combustible permitted
Floor Assembly FRR	1 hour minimum	N/A (1 storey)
Sprinklers Required	Yes (NFPA 13) if >600 m²	Generally not required
Fire Alarm System	Required	Required if occupant load >300
Typical Application	Mid-size churches, multi-level facilities	Small rural churches, chapels

HCMI TIP: When discussing your project with the Chief Building Official (CBO), confirm which subsection applies to your design early. The difference between 3.2.2.24 and 3.2.2.25 can affect your budget by tens of thousands of dollars.

4. Fire Safety Requirements

Fire safety is the most heavily regulated aspect of church construction under the OBC. As a **Group A, Division 2** assembly occupancy, your church must meet rigorous fire protection standards designed to protect large gatherings of people. The requirements fall into several categories.

Fire-Resistance Ratings for Structural Members

Fire-resistance ratings (FRR) specify how long a building element must maintain its structural integrity during a fire. For Group A, Division 2 buildings under 3.2.2.24, floor assemblies require a minimum 1-hour FRR. Load-bearing walls, columns, and arches supporting an assembly with a required FRR must themselves achieve that rating. Mezzanines within assembly spaces must also meet FRR requirements. Under 3.2.2.25, because the building is limited to a single storey, FRR requirements are significantly reduced.

Fire Separations

Fire separations are required between the assembly portion of the building and any other major occupancy within the same structure. For example, if your church includes a daycare (Group A, Division 2 or possibly Group C), kitchen facilities, or office spaces, fire separations with appropriate ratings must be provided. These separations must extend from floor slab to the underside of the floor or roof above, and all penetrations (ducts, pipes, wiring) must be properly fire-stopped.

Sprinkler Systems

For buildings under OBC 3.2.2.24, an automatic sprinkler system designed and installed in accordance with **NFPA 13** (Standard for the Installation of Sprinkler Systems) is required when the building area exceeds 600 m². The sprinkler system must cover the entire building, including concealed spaces above ceilings and below stages. For buildings under 3.2.2.25 (single storey, max 600 m²), sprinklers are generally not required, provided other life-safety requirements are met.

Fire Alarm Systems

A fire alarm system is required in Group A buildings. The system must include manual pull stations at every required exit, audible alert devices (horns or speakers) throughout the building, visual alert devices (strobes) in all accessible areas and washrooms, annunciator panel at the main entrance for fire department use, and connection to a monitoring station for automatic fire department notification. The fire alarm system must be designed by a qualified professional and installed by a licensed contractor.

Standpipe and Smoke Control

Standpipe systems may be required depending on building height and area. For most church buildings under 3.2.2.24 and 3.2.2.25, a full standpipe system is typically not required, though hose connections associated with the sprinkler system may serve this purpose. Smoke control is addressed through requirements for openable windows or mechanical ventilation in certain configurations, particularly where interior corridors serve assembly spaces.

> **HCMI TIP:** Fire protection systems represent a significant portion of your construction budget—typically 8–12% for sprinklered Group A buildings. Budget for this early and engage a fire protection engineer during the design phase, not after drawings are complete. HCMI includes fire protection cost estimates in every project budget we prepare.

5. Exiting Requirements

Exiting requirements for **Group A, Division 2** assembly occupancies are among the most stringent in the OBC. Because churches can hold hundreds of people in a single room, safe and efficient egress is paramount. These requirements directly affect your floor plan and overall building layout.

Occupant Load Calculation

The OBC calculates occupant load based on the use of each space. For assembly spaces with fixed seats, the occupant load is the number of fixed seats. For assembly spaces without fixed seats (as in many modern worship spaces), the occupant load is calculated at **0.75 m² per person** for standing areas and **1.85 m² per person** for spaces with non-fixed seating. A 500 m² worship space with non-fixed seating would have a calculated occupant load of approximately 270 persons. This number drives your exit requirements.

Number of Exits

Every floor area and every room designed for assembly use must have at least **2 exits**. When the occupant load exceeds 60 persons, exits must be located so that the travel distance from any point to the nearest exit does not exceed the OBC limits. For rooms with an occupant load greater than 60, at least 2 doors are required, and they must swing in the direction of travel. When occupant loads exceed 500, a minimum of 3 exits is required.

Travel Distance

The maximum travel distance from any point in a floor area to the nearest exit depends on whether the building is sprinklered. In a **sprinklered** Group A building, the maximum travel distance is **45 m**. In an **unsprinklered** building, the maximum is **30 m**. These limits often dictate exit placement and can influence the overall floor plan.

Exit Width, Hardware, and Signage

Exit width is calculated based on the occupant load served. The OBC requires a minimum clear width of 1,100 mm for corridors serving assembly occupancies. Door widths must be at least 860 mm clear. **Panic hardware** (push-bar devices) is required on exit doors serving rooms with an occupant load greater than 60 in assembly occupancies. All exits must be marked with **illuminated exit signs** visible from the path of travel. **Emergency lighting** must be provided in all exit paths, assembly spaces, and corridors, capable of maintaining illumination for a minimum of 30 minutes upon power failure.

> **HCMI TIP:** Exit requirements frequently surprise building committees because they affect furniture layout, not just architecture. Ensure your seating plan accounts for required aisle widths (minimum 1,100 mm for main aisles in assembly spaces) and that aisles lead directly to exits. HCMI reviews seating layouts against OBC egress requirements.

6. Accessibility (AODA and OBC)

Accessibility requirements for church buildings come from two sources: the **Ontario Building Code** (Section 3.8) and the **Accessibility for Ontarians with Disabilities Act (AODA)**. Together, they establish minimum standards for barrier-free design that apply to all new construction and major renovations of **Group A, Division 2** assembly occupancies.

Barrier-Free Path of Travel

A barrier-free path of travel must be provided from the site arrival point (accessible parking, passenger drop-off) to the building entrance and throughout the building to all areas normally accessed by the public. This path must be at least 920 mm wide (1,100 mm in corridors), free of steps and abrupt level changes exceeding 13 mm, and equipped with appropriate door hardware (lever handles, no knobs). Where the path crosses a level change, ramps (max. 1:12 slope) or elevators must be provided.

Accessible Washrooms

At least one barrier-free washroom must be provided on every floor that has washroom facilities. The washroom must have a minimum clear floor space of 1,700 mm x 1,700 mm, grab bars at the toilet and transfer areas, a lavatory accessible from a seated position, lever-style faucet handles, and an accessible door with adequate clear width (860 mm minimum).

Accessible Entrances and Hearing Augmentation

At least 50% of pedestrian entrances (minimum of one) must be barrier-free. Accessible entrances must include power-operated doors or doors with a maximum opening force of 38 N. For assembly spaces, the OBC requires **hearing augmentation systems**—typically an assistive listening system (hearing loop, FM, or infrared)—when the assembly space has an occupant load of 100 or more. This is a frequently overlooked requirement that affects your audiovisual design and budget.

Visual Fire Alarms and Accessible Parking

Visual fire alarm devices (strobes) must be provided in all barrier-free washrooms, corridors, and assembly spaces. Accessible parking spaces must be provided per OBC ratios—generally 4% of total parking spaces, with a minimum of one. Accessible spaces must be located on the shortest accessible route to the barrier-free entrance, be a minimum of 2,400 mm wide with an adjacent 1,500 mm access aisle, and marked with the International Symbol of Accessibility.

> **HCMI TIP:** Accessibility is not just a code requirement—it reflects your congregation's commitment to welcoming all members of the community. HCMI recommends exceeding minimum OBC accessibility standards wherever your budget allows. Consider features like zero-threshold entrances, wide aisles throughout (not just at exits), and hearing loop systems in smaller meeting rooms as well as the main sanctuary.

7. Energy Efficiency (Supplementary Standard SB-10)

Ontario’s energy efficiency requirements for buildings are set out in **Supplementary Standard SB-10**, which is referenced by OBC Section 12. SB-10 applies to all new construction and major renovations, including **Group A, Division 2** places of worship. Compliance with SB-10 is mandatory and is verified as part of the building permit process.

Building Envelope

The building envelope—walls, roof, windows, doors, and foundation—must meet minimum thermal performance standards. For churches, which often feature large window areas and high-volume sanctuaries, envelope performance is critical. SB-10 prescribes minimum effective R-values for walls (typically R-20 to R-24 for above-grade walls), roof assemblies (R-30 to R-40 depending on configuration), and foundation walls. Window-to-wall ratios above 40% trigger additional performance requirements. Churches with large stained glass or decorative window programs need to account for these limitations in design.

HVAC Efficiency

Heating, ventilation, and air conditioning systems must meet the efficiency standards in SB-10, which references ASHRAE 90.1 or the National Energy Code for Buildings (NECB). For churches, key considerations include high-efficiency heating equipment (minimum 90% AFUE for gas-fired equipment), programmable or automated controls to reduce energy consumption during unoccupied periods (churches are often unoccupied for significant portions of the week), ventilation rates per ASHRAE 62.1 for assembly occupancies, and heat recovery ventilation (HRV/ERV) to recapture energy from exhaust air.

Lighting Power Density

SB-10 limits the maximum lighting power density (watts per square metre) for different occupancy types. For assembly spaces, the allowable lighting power density is typically limited. Churches with elaborate stage lighting or performance lighting systems should work with their electrical engineer to ensure compliance. LED lighting is virtually essential for meeting current LPD limits. Occupancy sensors and daylight-responsive controls are increasingly common compliance strategies.

> **HCMI TIP:** Energy efficiency investments pay for themselves over time through reduced utility costs. Churches are particularly well-suited to energy-efficient design because they have predictable occupancy patterns. HCMI recommends targeting energy performance 15–20% better than the minimum SB-10 requirements—the incremental construction cost is modest and the long-term savings are substantial.

8. Key Takeaways for Building Committees

The Ontario Building Code is complex, but your building committee does not need to become code experts. What you *do* need is enough understanding to ask the right questions, evaluate professional advice, and avoid costly surprises. Here are the essential points to remember:

1. **Your church is Group A, Division 2.** This is your building's fundamental classification under the OBC. Every other code requirement flows from this designation. Confirm this with your architect and your Chief Building Official at the very start of your project.
2. **Know your subsection: 3.2.2.24 or 3.2.2.25.** Most church projects fall under OBC 3.2.2.24 (up to 2 storeys, 2,400 m² maximum) or 3.2.2.25 (1 storey, 600 m² maximum). The difference affects construction type, sprinkler requirements, and overall project cost. Understand which one applies to your project.
3. **Budget for fire protection early.** Sprinkler systems, fire alarms, and fire-rated construction are among the most expensive code requirements. Include them in your initial project budget, not as an afterthought.
4. **Exiting requirements shape your floor plan.** The number, width, and location of exits are determined by occupant load calculations. Your seating capacity is a code-driven number, not an aspirational one.

5. **Accessibility is both law and ministry.** OBC and AODA requirements establish minimums. Your congregation's commitment to inclusivity should guide you to exceed them where possible.
6. **Energy efficiency is mandatory and beneficial.** SB-10 compliance adds to construction costs but reduces long-term operating expenses. Design for performance beyond the minimum.
7. **Engage qualified professionals.** Retain an architect experienced with Group A assembly occupancies, a fire protection engineer, and a code consultant if your project is complex. The cost of professional advice is far less than the cost of code-related redesigns.
8. **Partner with HCMI.** Hawkey Church Management Inc. has guided dozens of Ontario congregations through the building process. We understand both the technical requirements of the OBC and the unique needs of faith communities. Contact us at 519-509-6363 or visit www.churchbuilder.ca.

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Hawkey Church Management Inc. is Ontario's trusted partner for church building projects. From initial feasibility studies through construction completion, we help congregations navigate the Ontario Building Code, manage budgets, and build facilities that serve their mission for generations.

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