

**THE JOINT COMMITTEE ON HOUSING, LOCAL GOVERNMENT AND HERITAGE
MEETING OF THE COMMITTEE TO DISCUSS MODERN METHODS OF
CONSTRUCTION**

**TUESDAY 9 MAY AT 3.00 PM IN COMMITTEE ROOM 3, LH2000, LEINSTER
HOUSE**

Dominic Stevens - JFOC Architects Ltd

Hello, My name is Dominic Stevens, I am a lecturer in TU Dublin and in private practice as an architect, a director in JFOC architects, a company which has helped deliver over 10,000 homes over the past 35 years. Since my involvement during the last 8 years in JFOC we have specialised exclusively in residential living in low, medium and high density environments, with projects in planning and in construction across Ireland. I am here with Claire McManus, who is the other director in JFOC. She sits on the Housing Agency's 'Supply & Affordability Panel', the DHLG/RIAI 'Joint Housing Committee', the CSO 'Housing Statistical Working Group' and Dublin City Council's 'Special Purpose Housing Committee', along with being the RIAI Spokesperson on Housing.

My early career was in Germany and over the years I have stayed in touch with practice there, in particular housing practice. This has provided me with insights into both systems. Modern methods of construction lie at the core of the production of German housing, I will leave it to others to discuss the technical and industry aspects of this, here I want to discuss a number of other key issues related to design, planning and regulation.

INTRODUCTION

It is crucial for the planning and regulatory systems to adapt to be able to serve the production of affordable housing using MMC.

It has to be understood that the future of MMC lies in off-site timber manufacture, for both low rise and high rise buildings. This affords great potential for meeting our climate goals and for growing a domestic high tech timber manufacturing industry. For the timber frame manufacturers who operate in Ireland tooling up for large amounts of repetition across projects over a longer period of time could greatly increase efficiency and will reduce building costs.

There is a lot of discussion around whether we should have national housing standards or allow local authorities set their own standards. To have any hope of delivering MMC at scale, we need national standards. We should be proud of our housing standards as amongst the highest in Europe, both in terms of space standards, and building standards. We should not be afraid of Irish minimum standards, indeed we can be proud that a minimum standard apartment is amongst the largest in Europe.

We will have huge difficulty delivering these efficiencies through MMC without adaptation to planning and regulatory environments for two main reasons.

1. Because of the Irish planning system, where bespoke solutions are often insisted upon, and standards differ from county to county.
2. Because the guidelines and building regulations are constantly changing.

EXAMPLE IN PRACTICE

As an example, We are currently working on designs for planning applications that are based on our winning Housing Unlocked competition design. We developed this design with timber frame manufacturers FastHouse Ltd to be an example of economic, off-site construction. This design was selected as excellent by a jury of architects, urban designers and housing experts so we can safely assert that it proposes high quality. Despite this when we apply the solutions proposed in this design to individual local authorities in the planning process it meets resistance despite meeting all regulations. It simply doesn't seem 'orthodox' to them and so they apply their own subjective opinions. This problem is added to because almost all housing projects of a certain scale end subject to third party appeal often leading to further modifications as it gets assessed by An Bord Pleanala.

It has been recognised that these and many other inefficiencies in planning in this country bring uncertainty for investors, costly and unnecessary delays for delivery, missed opportunities for contractors and housing shortfalls for the population. From a MMC perspective where certainty is required to tool up for repetition this lack of certainty in the planning process could be fatal.

COMPARITIVE PLANNING SYSTEMS

When we compare the German and Irish planning systems, we find two democratic systems that are fundamental to our constitutions. Both have national, regional and local planning levels, which follow professional and political procedure. There are however three

fundamental lessons we can learn from Germany regarding efficiency, accountability and certainty in development:

Efficiency: In Germany, the planning effort is applied first to larger masterplan areas, called B Plans. This process brings community involvement forward, (much like in the Irish strategic development zone SDZ system), where the more contentious issues such as building height and density are decided at plan formation stage. These are as demanding to get in place, but once decided they set a fixed rule for the development of an entire area. By complying with the established rules, all sites coming forward for development can get planning approval much faster.

Accountability: Planning rules in Germany are not policy but law, called BGB. In this sense, the pre-application advice is legally binding for the local planning authority. This allows certainty. Our entire economy works on accountability and performance, so there's no reason that a council shouldn't behave in the same way.

Certainty: In Germany, development law translates ambiguity into rule-based formulas. These set clear rules for site coverage, building height, maximum floor area across all floors and distances to the neighbouring site boundary for example. You get this all confirmed via a pre-application and you know where you're going. This certainty invites more smaller players who cannot afford to (effectively) gamble hundreds of thousands of euros on planning applications, with high chances of refusal or overturning.

A NOTE ON REPETITION: Is repetition in housing not tantamount to poor quality? Is this 'Prefab'?

In fact repetition has always been crucial in the production of housing, even using traditional construction methods. Urban designers often refer to housing and offices as 'fabric' as opposed to public buildings, called 'monuments. If we step outside into Georgian Dublin we are in a sea of similar house types, if we walk a little further into Portobello or the Liberties we are in repeating Victorian house types. This is not the same in more recent housing where each individual apartment building is unique. This has happened through the architecture profession responding to the demands of a planning system that favours novelty and bespoke design. Using MMC, alterations to specific finishes, window styles etc remains possible, but the main thrust of the building design and form is best fixed. Think of a Georgian house, they all have the same floor plan and logic.

SUMMARY

In order to embrace the opportunities afforded by MMC a number of actions are key.

1. **ACTION:** The planning system will need to be reformed to allow MMC to take place in Ireland. It will need to learn from more successful planning regimes in other EU countries. It can't remain ambiguous and subjective. It needs to be objective and rule based. Standards have to be national standards.
2. **ACTION:** A new type of planning permission will need to be added. This will entail a planning application for specific unit types that can be deployed on any site over a specific time period, we suggest 5 years. This will lead to more efficient site by site planning applications. This will allow off- site manufacturers to tool up for production of a specific unit or component part of a unit in the knowledge that a market for will exist into the future.
3. **ACTION:** Basic guidelines and building regulations will need to be frozen for a specified period of time so that manufacturers can develop products in the knowledge that they won't be obsolete if a new directive is issued. While the current constant 'changing of goal posts' in this regard is already extraordinarily disruptive to the economic and efficient production of housing, it will entirely prevent MMC from being utilised if it continues.
4. **ACTION:** All standards pertaining to housing must be at a national level not local.
5. **ACTION:** Adaption of the building regulations to follow best EU practice and allow high-rise timber buildings is essential.

These are in line with the Mitchel McDermott report commissioned by the Department of Housing which recommends that a standardised approach for housing design and construction could lead to cost reduction.