



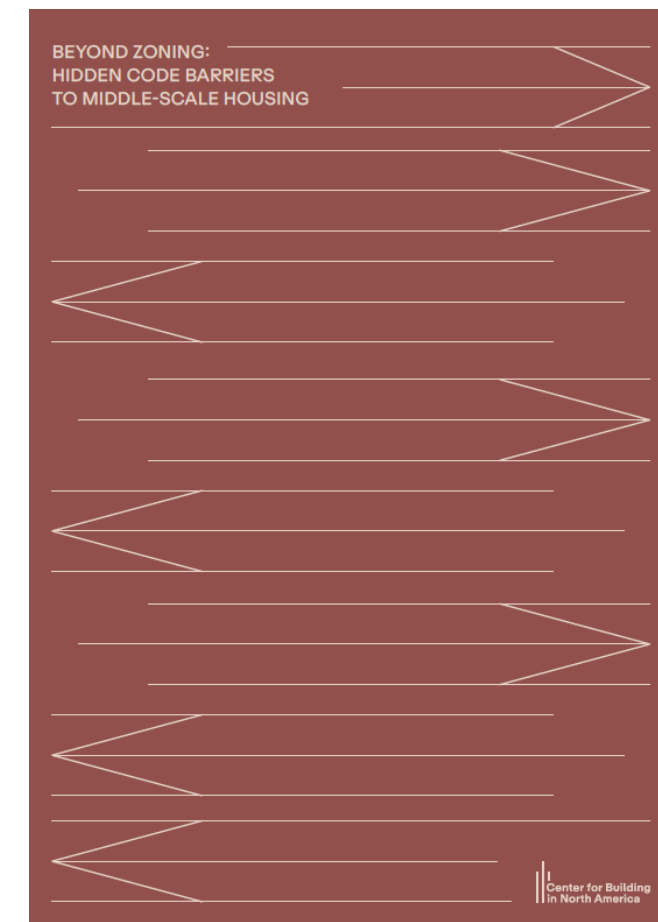
BEYOND ZONING: HIDDEN CODE BARRIERS TO MIDDLE-SCALE HOUSING



Beyond Zoning: Hidden Code Barriers to Middle-Scale Housing

<https://www.centerforbuilding.org/>

JOHN ZEANAH, FAICP
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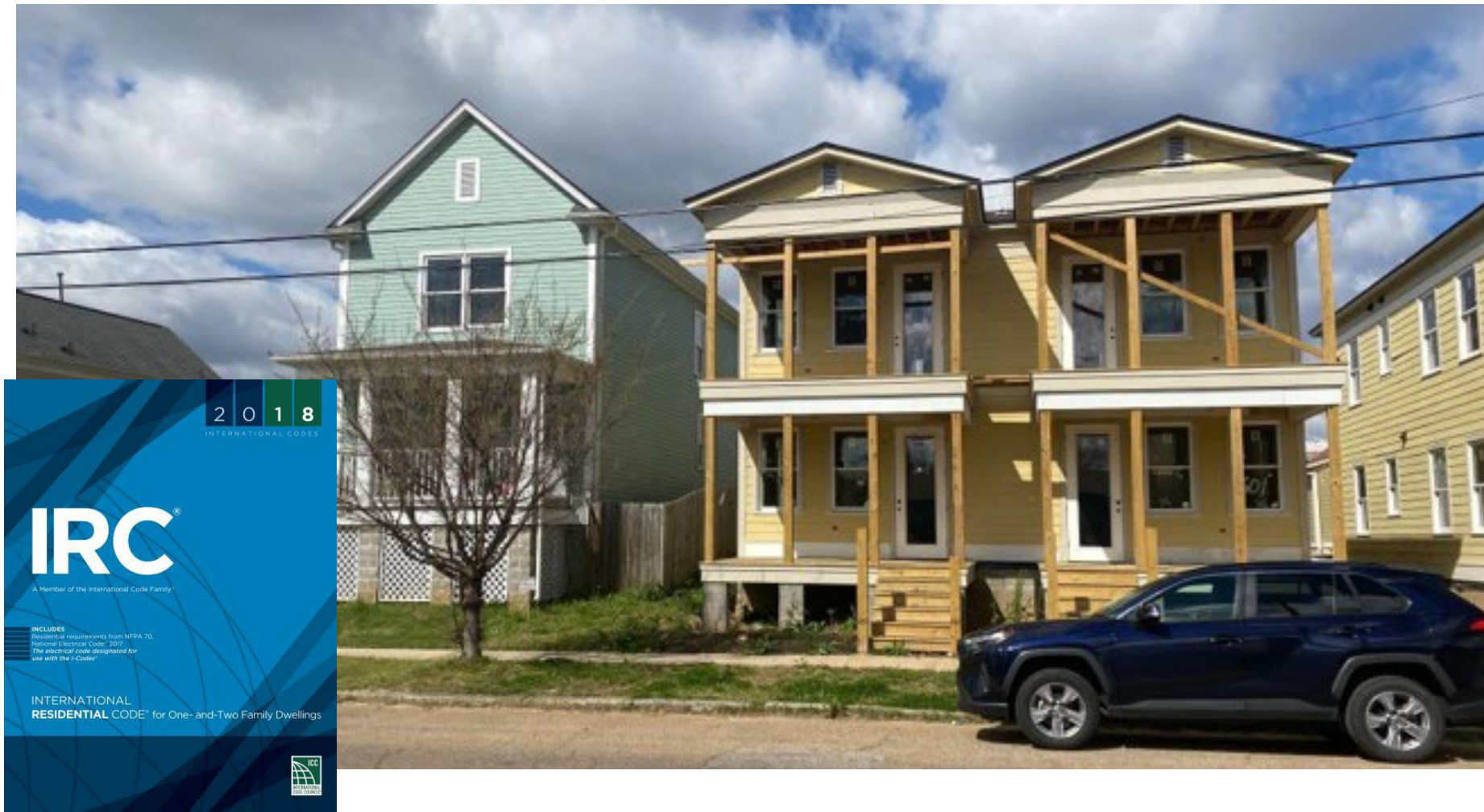


MALONE PARK COMMONS



35 units on .67 acres

THRESHOLDS MATTER: IRC V. IBC



SFR, Duplex, Townhouse

INTERNATIONAL RESIDENTIAL CODE

The International Residential Code (IRC) covers single-family buildings, and is generally less expensive than IBC projects.



Triplex+

INTERNATIONAL BUILDING CODE

The International Building Code (IBC) covers multifamily and commercial buildings, and increases project costs and timelines.

WHERE THESE CODES APPLY

IRC



**INCLUDES SINGLE-FAMILY,
DUPLEXES, TOWNHOMES, AND
ACCESSORY STRUCTURES NOT
MORE THAN 3 STORIES ABOVE
GRADE**

IBC



**INCLUDES ALL MULTIFAMILY,
STARTING WITH A TRIPLEX**

WHERE THESE CODES APPLY

IRC



**2 vs 3
UNITS**

IBC



COMPLEXITY VS DISPROPORTIONALITY

CONSTRUCTION REQUIREMENTS

IRC



**CAN BE BUILT BY SINGLE
FAMILY CONTRACTORS,
SIMPLER PERMITTING FOR
BUILDING & SITE**

IBC



**TYPICALLY REQUIRES A
COMMERCIALLY LICENSED
CONTRACTOR**

PROFESSIONAL DESIGN REQUIREMENTS

IRC



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**PRESCRIPTIVE STRUCTURAL
TABLES
BUILDER-PREPARED PLANS
SUFFICIENT
SIMPLER SEISMIC/WIND/SNOW**

IBC



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**TYPICALLY REQUIRES A
PROFESSIONAL STAMP & ARCH,
STRUCT, CIVIL, MECH,
ELECT, PLUMB, & SPRINKLER
ENGINEERING**

PERMITTING PROCESS

IRC



**SIMPLER PERMITTING FOR
BUILDING & SITE**

IBC



**MORE PERMITTING
REQUIREMENTS**

FIRE SAFETY

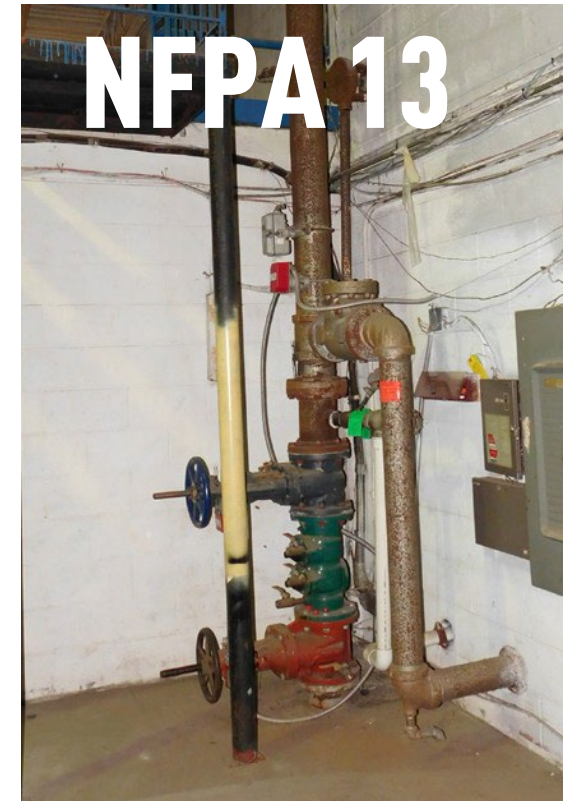
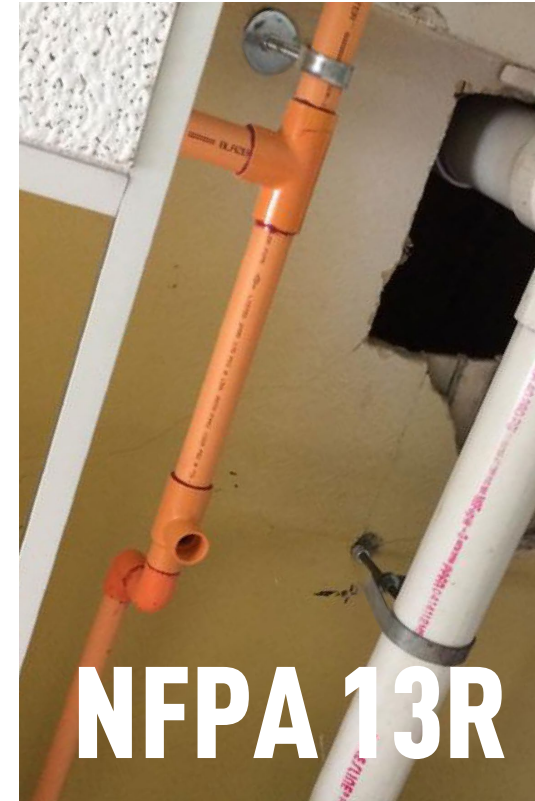
IRC



SMOKE ALARMS & FIRE RATED SEPARATIONS BETWEEN UNITS

1 HOUR SEPARATION FOR DUPLEXES
2 HOUR SEPARATION FOR TOWNHOMES

IBC



NFPA 13/13R SPRINKLERS,
COMMERCIAL FIRE ALARM
SYSTEMS, FIRE DEPARTMENT
ACCESS ON-SITE

FIRE SAFETY- SPRINKLER TYPES



**IRC/
SINGLE FAM**



**IBC/
MOST MULTI-FAM**



**IBC/
MIXED-USE/BIG
MULTI-FAM**

LOCAL CODE HURDLES

IRC



**TRADITIONAL SINGLE FAMILY
RESIDENTIAL PARKING, TAX, &
TRASH PICK UP**

IBC



**“COMMERCIAL” PARKING
LOT REQUIREMENTS, TAX
CLASSIFICATIONS, MUNICIPAL
TRASH COORDINATION, &
MORE**

STORMWATER REQUIREMENTS

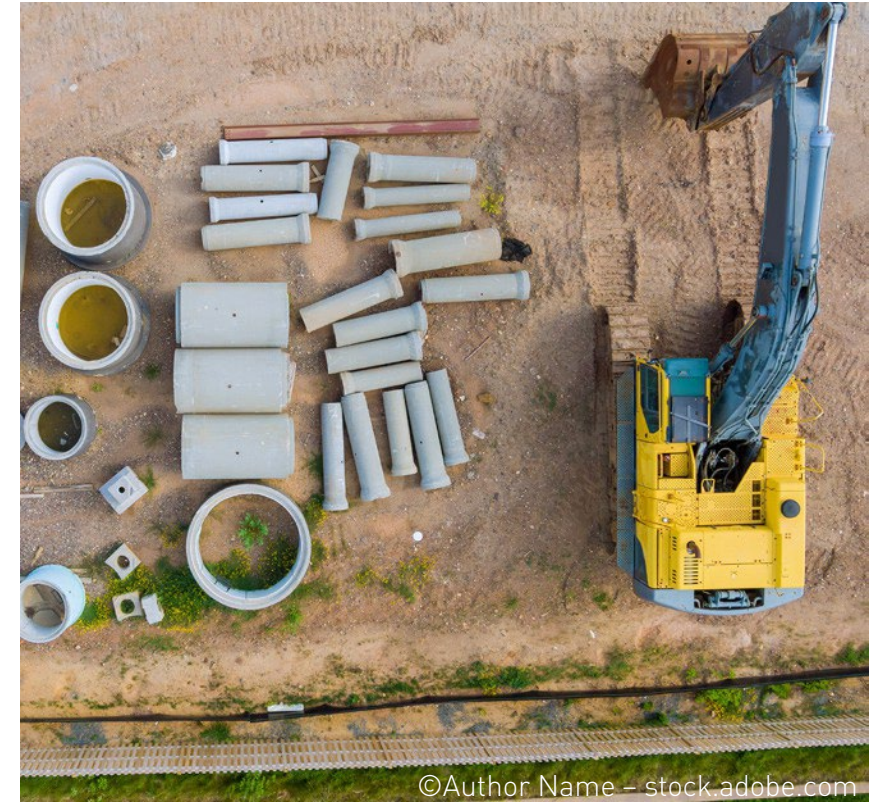
IRC



OFTEN
TRIGGERED BY
UNIT COUNT,
NOT BUILDING
SIZE

**RESIDENTIAL STORMWATER
REQUIREMENTS (IF ANY),
LOT COVERAGE
REQUIREMENTS**

IBC



**ON-SITE STORMWATER
DETENTION, GRADING & LOT
COVERAGE REQUIREMENTS -
ON THE SAME SIZE LOT**

TYPICALLY INCLUDES TOWNS

UTILITIES

IRC



**TRADITIONAL SINGLE FAMILY
UTILITY CONNECTIONS**

IBC



**LARGER METER SIZE AND/
OR WATER/SEWER MAIN
UPGRADES &
CAN REQUIRE BACKFLOW
PREVENTERS**

ENERGY CODE DIFFERENCES

IRC



TRADITIONAL SINGLE FAMILY HVAC REQUIREMENTS

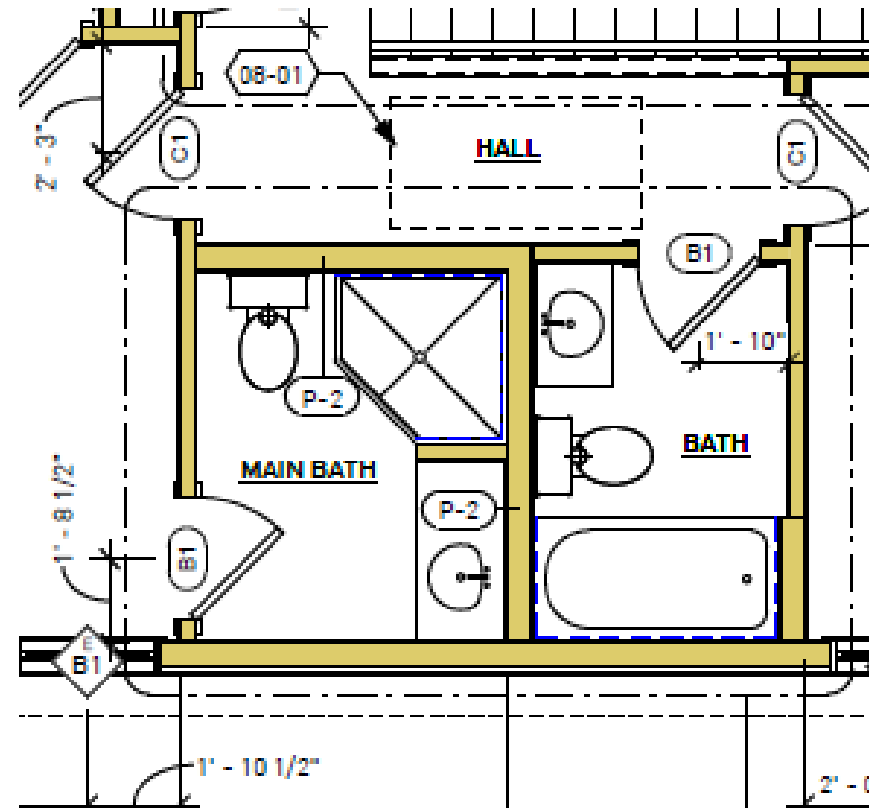
IBC



“COMMERCIAL” AIRFLOW REQUIREMENTS

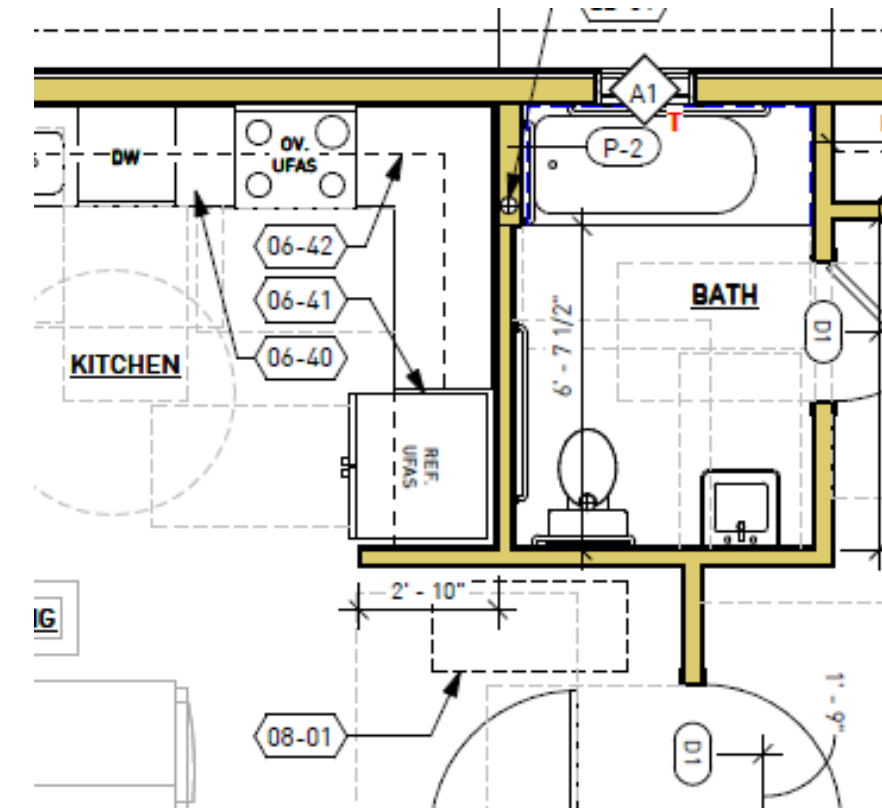
ACCESSIBILITY

IRC



NO REQUIREMENTS

IBC



FHA REQUIRES DESIGN & CONSTRUCTION THAT CAN BE UNFAMILIAR TO RESIDENTIAL CONTRACTORS

**4+ ATTACHED UNITS
DOES NOT APPLY TO 2-STORY TOWNS**

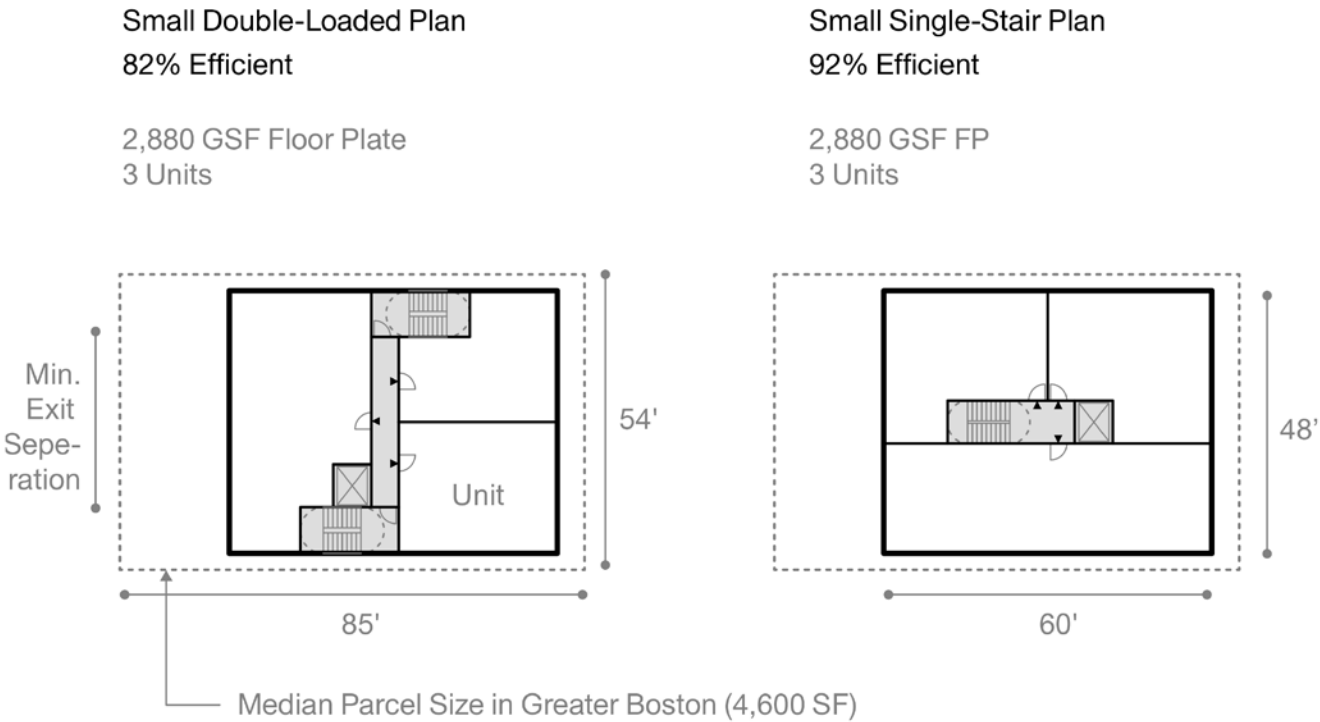
STAIR REQUIREMENTS

IBC



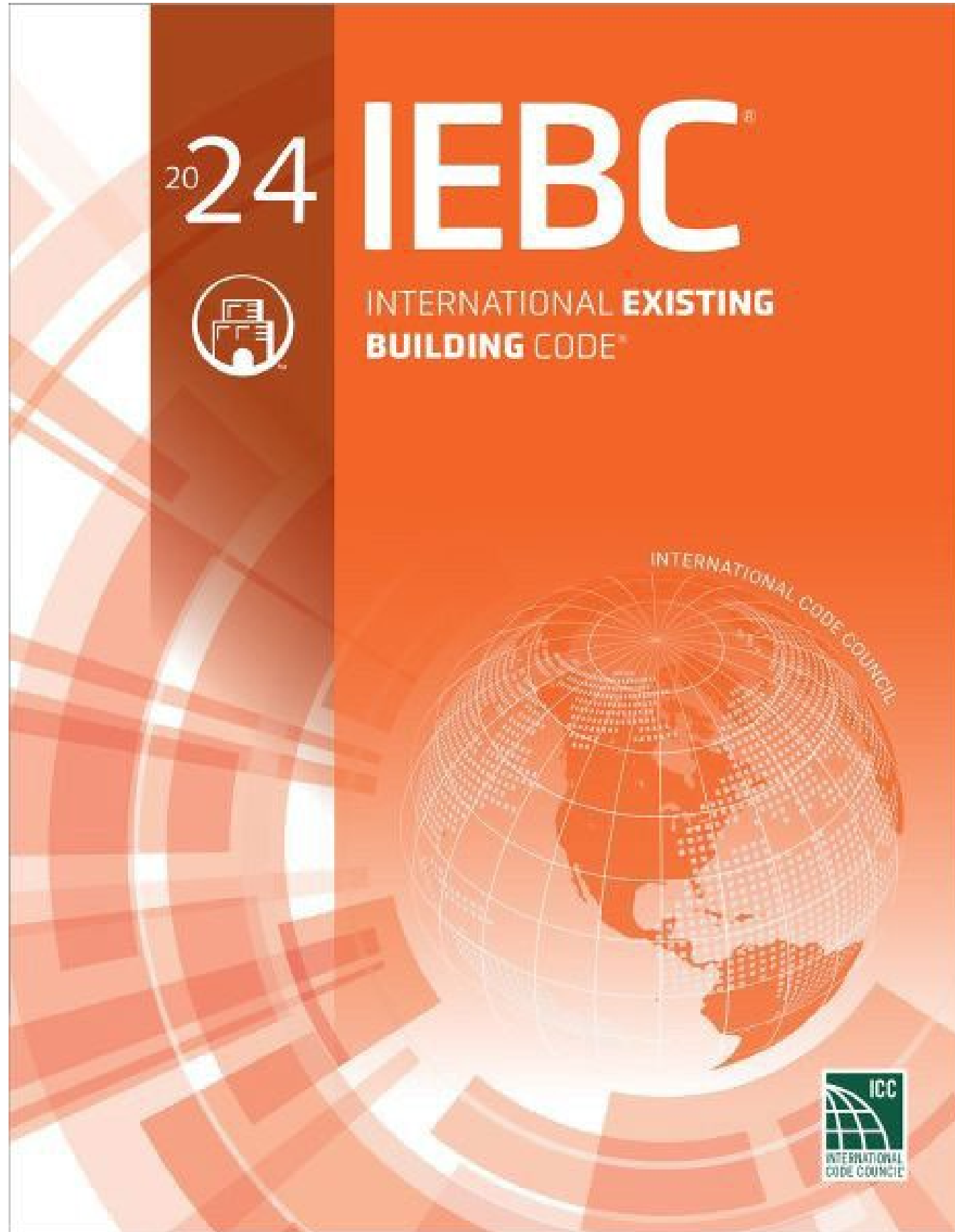
4 UNITS/FLOOR
3 STORIES =
SINGLE STAIR

IBC



4+ UNITS/FLOOR
4+ STORIES =
ADDITIONAL STAIRS

MORE CODES!



IEBC ALSO REQUIRES UPDATES

**UPDATE SO CHANGE OF
OCCUPANCY FOR 4 UNITS OR
LESS DOESN'T TRIGGER FULL
UPGRADES (SPRINKLERS)**

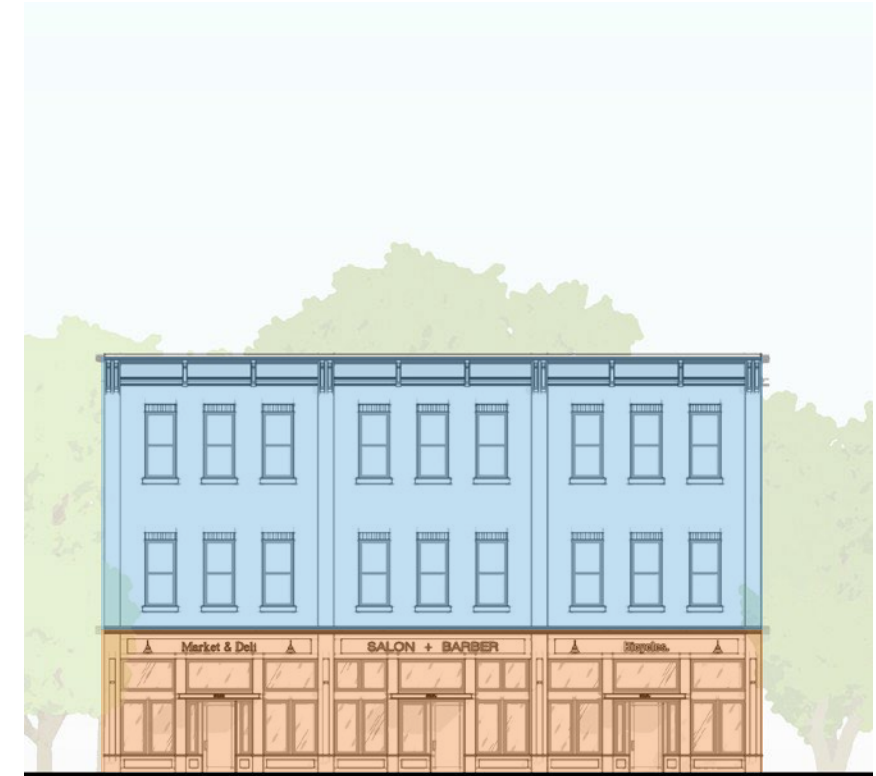
MIXED USE

IBC



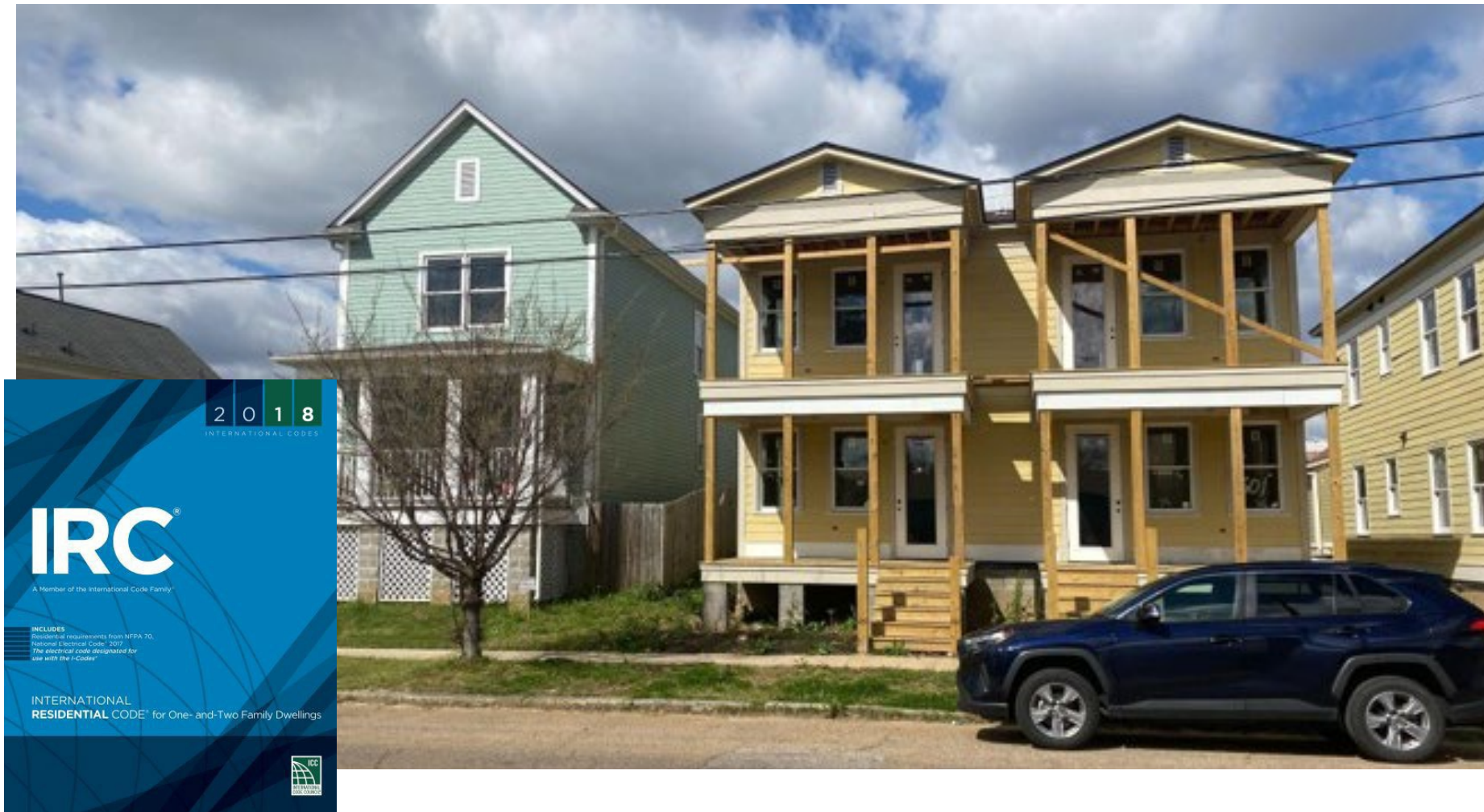
**HORIZONTAL MIXED USE:
13R SPRINKLERS**

IBC



**VERTICAL MIXED USE:
COMMERCIAL SPRINKLERS**

HOW WE STARTED



Up to six units

INTERNATIONAL RESIDENTIAL CODE

In 2022, Memphis and Shelby County began enforcing a local amendment to the IRC that permitted up to six units to be governed by that code.

**BLOCKED BY
TENNESSEE
STATE FIRE
MARSHAL'S
OFFICE**

HOW WE STARTED



BACK TO THE INTERNATIONAL BUILDING CODE

In 2024, City of Memphis and Tennessee Homebuilders Association secured passage of legislation allowing for a proportionate fire separate alternative for 3- and 4-family buildings.

WHERE IT STANDS



PROPORTIONAL STANDARDS FOR:

- **SPRINKLERS**
- **ALARMS**
- **EGRESS**
- **STRUCTURAL**
- **PLAN REVIEW**
- **USE MIX**

In 2025, Memphis/Shelby County drafted an IBC Appendix for Middle-Scale Housing (up to 24 units) with the help of the Tennessee State Fire Marshal's Office.

WHAT'S NEXT



Grant support from Pew Trusts to research cost comparison and structural/fire safety impacts for three prototype buildings within the scope of the Memphis Appendix.

International Code Council has established the G13 Committee on High-Density Residential to consider code amendment proposals for middle-scale housing (up to 24 units).



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