



DATE: August 21, 2018

TO: Economic Innovation and Innovation Committee members

FROM: Ken Bowers, AICP, Planning Director
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RE: Urban Frontages: Application and Potential Revisions

Background

This memo provides information and analysis regarding frontage regulations in the Unified Development Ordinance. It includes a review of existing frontage requirements and the intent underlying their application, as well as staff recommendations for modest code and policy changes to more closely achieve desired outcomes.

Frontages were an important regulatory tool introduced as part of the UDO. They differ from the traditional zoning focus on setbacks in that they provide a range of approaches to how buildings interact with the street. In contrast to setbacks, which many cities apply regardless of context, frontages are context-sensitive and often use build-to lines rather than setbacks. They also use a broader set of form- and design-related controls, including the location of entrances and the location and amount of any parking between the building and street. The intent is to ensure an appropriate appearance and function for buildings based on context, such as ensuring that development in urban, walkable areas enhances pedestrian comfort and safety.

Frontages were applied to many properties through the remapping process that implemented the UDO. They also are often requested by rezoning applicants to obtain altered setbacks or parking reductions, to move primary tree conservation areas off the primary frontage, and to obtain consistency with Comprehensive Plan guidance regarding urban form. During the rezoning process, staff evaluates such requests against the Comprehensive Plan's Urban Form Map, which provides guidance for what type of frontage approach is appropriate for specific areas.

Even without frontages, mandatory build-to requirements apply to certain building types, such as apartments and townhouses. Other building types only have minimum setbacks.

All frontages, as well as the build-to requirements for apartments and townhouses, specify different requirements for primary streets as opposed to side streets when a property fronts on more than one street. These include requirements for a street-facing entrance facing the primary street, and for many frontages, a stricter build-to requirement. *One recurring issue has been that existing criteria for designating primary streets can have the potentially unintended impact of forcing residential uses to be built close to higher-volume arterial roadways, as the criteria favor the street with the higher classification.*

Overview of UDO Frontage Requirements

The UDO has seven different frontage designations. Additionally, some elements regulated by frontage are addressed by UDO standards even when a frontage is not applied. For the purpose of analysis, some can be grouped together into broader categories. A brief description of each follows.

No Frontage. Most parcels in the city have no designated zoning frontage. For these parcels, the relationship to between the building and the street is addressed by other tools, primarily required building and parking setbacks, which vary by district and building type. Minimum primary street setbacks range from three feet for certain building types in mixed-use districts to 50 feet in Heavy Industrial. There is no maximum setback in most zoning/building type categories. Two building types, Apartment and Townhouse, include a build-to requirement of between 10 and 55 feet. Front building wall is mandated to fill 70 percent of the build-to area for these housing types.

Suburban Frontage. This describes a frontage approach for major corridors in suburban portions of the city where the creation of walkable centers is deemed unlikely. This category includes one zoning frontage, Parkway.

The intent is to is to buffer suburban arterials where transit or pedestrian activity is minimal. The **Parkway** frontage mimics the use of Special Highway Overlay Districts in the pre-UDO code. It includes a 50-foot setback and a required tree conservation/landscape buffer at the front edge.

Hybrid Frontage. This category includes a frontage approach designed to support a higher level of walkability than in areas designated for a suburban frontage. It includes two zoning frontages, Parking Limited and Detached.

- **Parking Limited**, the more widely-used of the two, is intended for suburban areas served by transit. It works by limiting the amount of parking that can be placed between a building and the street and ensuring buildings are not located too far from the sidewalk. It allows no more than two bays of parking in front of a building, which avoids

the sense of exposure for pedestrians and tends to align future cross-access points. *The frontage includes a build-to of between 0 and 100 feet.* Because frontage requirements trump setbacks, this permits a front setback of zero, but it also permits a larger setback for the apartment and townhouse building types than would be allowed with no frontage.

- The **Detached** frontage is intended for areas transitioning from lower-density residential uses to more intensive uses. Its aim is to accommodate more density or commercial uses while maintaining the detached *form* of a residential area. Unlike Parking Limited, Detached does not permit parking between the building and the street. However, it also does not specify any build-to range, instead allowing the build-to or setback of the underlying zoning or building type to control.

Urban Frontages. This category describes the frontages used in areas where the highest level of walkability and retail foot traffic is desired. It includes four zoning frontages: **Green, Urban Limited, Urban General,** and **Shopfront.**

While these frontages vary in terms of build-to, they all prohibit parking between the building and the street. Required build-to requirements range from 20 – 50 feet with a 50 percent building placement requirement in Green, to a 0 – 15 foot/80 percent requirement in Shopfront. Significantly, they all provide a substantial reduction in required off-street parking, reflecting the fact that many more trips in these areas are made by people walking, riding a bicycle, or taking transit. Like hybrid frontages but unlike suburban frontage, they override requirements for tree conservation areas, requiring street trees instead. They also require wider sidewalks and a more generally urban streetscape. Shopfront is the only frontage that effectively mandates mixed-use development—only the mixed-use, civic, and open lot building types are permitted.

Multiple-Frontage Lots. This describes a situation where a property fronts on more than one street, as in the case of a corner lot or a “through lot,” meaning a lot that occupies the entire area between two streets but is not on a corner. This involves determination of which of the streets is the primary frontage, and which is considered to be a side street. That designation affects the building design, as the frontage requirements for the side facing a primary street are more stringent than for the side facing a side street.

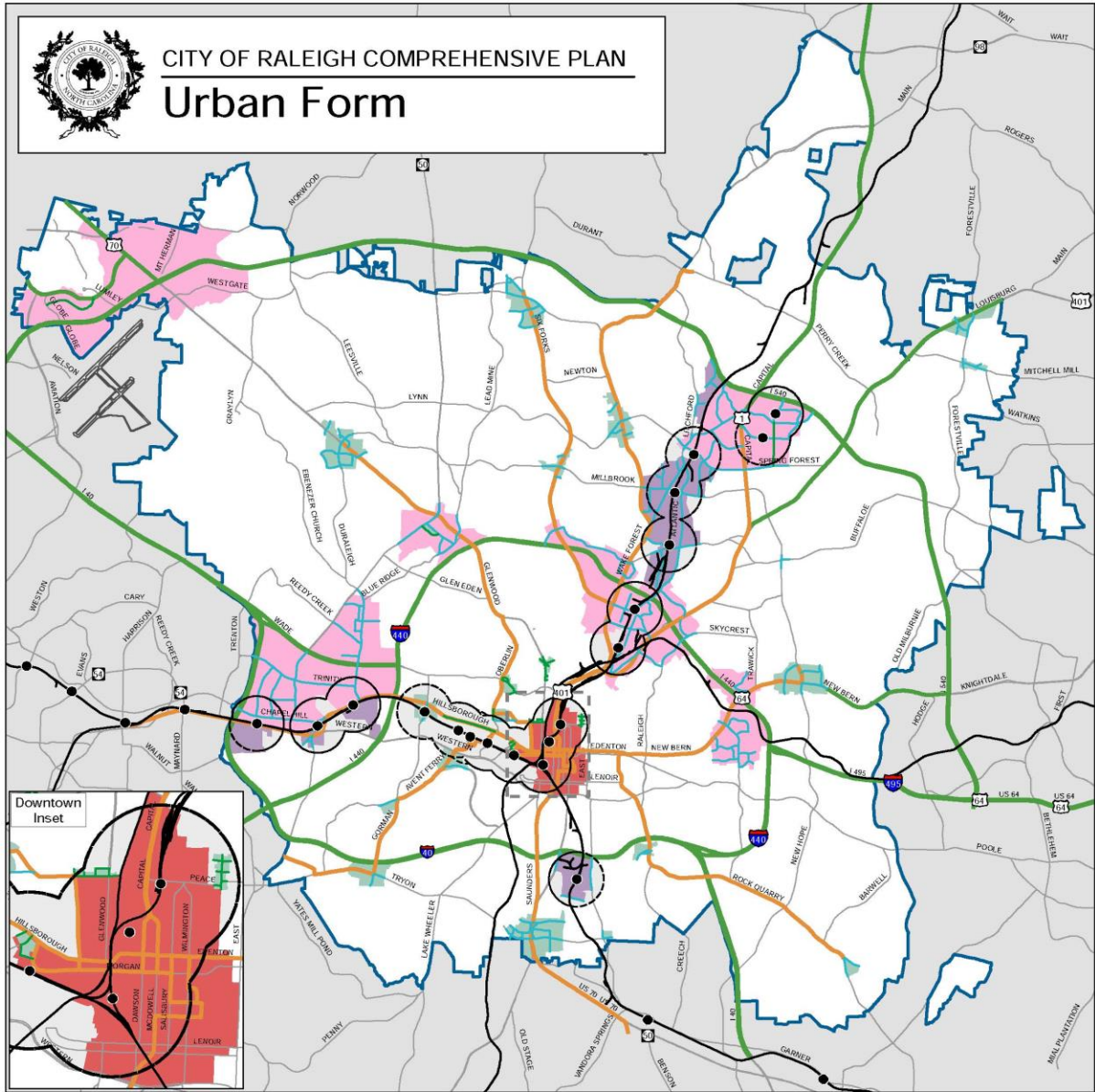
In the case of a through lot, both streets are deemed to be a primary street. In the case of a corner lot, the decision about which is the primary street and which is the side street is made by the Planning Director. The decision is informed by specific criteria set out by the UDO, including the street with the higher classification, the established orientation of the block, the length of the block face, and other criteria.

Overview of Urban Design Guidance

The Comprehensive Plan provides specific guidance on where frontage should be applied. The Urban Form Map (shown on following page) designates different types of centers and corridors and specifies whether a suburban, hybrid, or urban approach is appropriate. The Map is



CITY OF RALEIGH COMPREHENSIVE PLAN
Urban Form



MAP UD-1

Centers

- Downtown
- City Growth Centers
- Transit Oriented Districts (TODs)
- Mixed-Use Centers

Corridors

- Main Streets
- Transit Emphasis Corridors
- Urban Thoroughfares
- Parkway Corridors

- Future Fixed-Guideway Transit
- Transit Stop Half-Mile Buffers
- Raleigh Jurisdictional Limit



0 0.5 1 2 Miles

Map created 11/6/2015 by the City of Raleigh
Department of City Planning

specifically intended to tie frontage to planned transit investments, and is being revised in the pending Comprehensive Plan Update to reflect current transit plans. The map also incorporates recommendations from adopted area plans.

In terms of centers, Downtown and Transit-Oriented Districts represent the areas where the highest levels of walkability are desired. Both recommend urban approaches, without designating a specific type of urban frontage. City Growth Centers, which describe areas where significant infill development and redevelopment are expected, recommend either an urban or hybrid approach, while recognizing that existing conditions may suggest alternative approaches. Mixed-Use Centers describe areas where additional walkability is desired, which suggests an urban approach to frontage.

The Plan designates four types of corridors: Main Streets, Transit Emphasis Corridors, Urban Thoroughfares, and Parkway Corridors. Main Streets describe traditional pedestrian-oriented streets such as Hillsborough Street, as well as streets where a more safe and comfortable pedestrian environment is a high priority. An urban frontage is recommended along these corridors. Similarly, an urban or hybrid approach is expected along Urban Thoroughfares, which are generally applied to densifying nodes beyond traditionally-walkable areas.

Transit Emphasis Corridors describe areas where a high level of bus service is provided or expected, such as Avenet Ferry Road or Capital Boulevard. For these corridors, a hybrid approach is recommended. This is intended as a means of supporting transit by providing some level of walkability, while recognizing that they are major streets that generally do not possess on-street parking.

Parkway corridors are places where SHOD zoning is, or was, applied; corridors identified for wide street yards and tree buffers in an area plan; and all the limited-access highways within the City's jurisdiction (most of which have SHOD zoning). The intent for these corridors is to ensure the tree conservation occurs along the edge of the major corridor or, where there are no trees to save, a deep landscaped area is provided.

While the Urban Form Map contains designations for a substantial percentage of the commercial areas and major corridors in the City, it is silent in many areas, however, and the implication is that a frontage would not be expected in those areas. These include lower-density residential areas, as well as commercial areas outside of primary nodes or corridors.

One aspect of Plan guidance that could be clarified is that while the Urban Form Map indicates where frontages are recommended, it is less explicit about the appropriateness of frontages in other locations. The Plan language implies that only areas designated by the Map should contain zoning frontages, but it does not state that plainly. *Therefore, a zoning petition offering a frontage where none is indicated on the Urban Form Map has generally not been considered inconsistent with the map.*

Frontages and Rezoning

Consistency with the Plan frontage recommendations outlined above is an important aspect of the review of rezoning requests. In cases where an appropriate frontage (either in the form of a zoning frontage, conditions that mimic a frontage, or a building type that includes a build-to) is not included with a rezoning request in an area designated on the Urban Form Map, the inconsistency is highlighted in the analysis.

When the UDO was drafted, it did not envision that frontages would be necessary on every property, instead allowing base zoning districts to control setback and build-to lines. There would be pros and cons to a broader use of frontages. One advantage would be greater specificity and clearer expectations regarding the form of development permitted by a rezoning. A disadvantage might be the perception of reduced flexibility for property owners. Another consideration would be that additional policy guidance would need to be developed in order to provide a rational and consistent basis for making decisions about frontages in specific cases.

Identified Issues and Staff Recommendations

The UDO and the guiding policies of the Comprehensive Plan place a high premium on pedestrian-friendliness and orientation. Of the seven frontages, only Parkway does not have as a goal a more walkable development pattern. The current deployment of frontages through both the remapping and the petition rezoning process has contributed to marginal improvements in walkable development that could better support transit use. Gone is the era when traditionally walkable streetscapes could be interrupted by large parking lots and buildings with no orientation to the street. However, some refinements to frontage policy and regulation are possible.

This memo has identified several issues with the current regulatory and policy framework, summarized in the table below and on the following page.

Topic	Issue	Potential Solution
Primary street designation	The criteria for identifying the primary street favor the widest and busiest street. This is not appropriate for residential, and may not be appropriate for mixed-use either, if a better main street environment can be achieved on a side street.	Revise primary street designation criteria. This would entail revising the existing criteria to better avoid undesirable outcomes, such as forcing residential to be oriented to the busier street on multiple frontage lots.

<p>Policy guidance for mapping frontage</p>	<p>The Comprehensive Plan provides clear guidance on where frontages of the different types should be mapped, but is less clear as to where frontage should not be mapped.</p>	<p>Clarify Comprehensive Plan policy guidance. This would involve directly stating where frontages should not be mapped, and that frontage should be requested only when needed for consistency with the Plan. It could also involve a closer look at areas where urban frontage is recommended and whether adjustments are needed. While tightening guidance regarding the application of urban frontage could limit situations where a building is perceived to be misaligned with the area, a potential consequence could be to hinder the evolution of some corridors into a more walkable form.</p>
<p>Tree conservation</p>	<p>The build-to requirements for the Apartment and Townhouse building types could lead to the loss of tree buffers along the property frontage, even when no frontage is mapped.</p>	<p>Prioritize Tree Conservation Areas. This would involve considering a UDO amendment stating that these areas would override build-to areas for apartments and townhouses, rather than the reverse.</p>
<p>Parking Limited frontage</p>	<p>Although Parking Limited is a suburban frontage, it allows a lesser setback than the more urban Green frontage, or what is required when no frontage is present.</p>	<p>Refine Parking Limited requirements Currently, this frontage allows a 0' setback. As that is not necessarily consistent with the intent of a hybrid frontage, a revision could specify that the minimum setback would instead be the same as when no frontage is mapped. This would be 5 to 10 feet depending on building type.</p>

Should City Council wish to move forward with any or all of these recommendation, a text change and/or Comprehensive Plan amendment would be required. Staff could report back with more specific text at a future date.