



Trotwood Together Planning and Zoning Code Audit Major Themes of Improvement

January 14, 2026

INTRODUCTION

This document aims to audit the existing Trotwood, Ohio, Planning and Zoning Code found in Part Eleven of the Codified Ordinances. The city embarked on this project following the adoption of the Trotwood Together Comprehensive Plan that outlined a future vision for development across the city. This document was developed following discussions with staff, elected officials, appointed planning officials, and the public throughout the planning process. The recommendations in this document are also based on the consultant's experience drafting regulations for communities across Ohio and the nation.

This report intends to summarize the strengths and weaknesses of the existing regulations in terms of usability, organization, and substantive standards and provide options for improvement. This document also includes a proposed outline for a reorganized code. That suggested outline would completely reorganize the regulations into a code that will improve usability by staff, residents, business owners, and city officials.

It is important to remember that this audit does not necessarily identify every issue or individual problem with the existing regulations, but focuses on broader issues that will need direction before any text amendments. Once staff and city officials have had an opportunity to review and provide feedback on this document, the city can decide on the next steps toward a modern planning and zoning code.



THEMES FOR IMPROVEMENT

Based on the initial input from the city and our review of the document, there are four major themes for improvement that will help achieve many of the goals set out for this project. This part of the report intends to summarize each proposed theme and provide a direction or options to address them. The major themes of improvement include:

- Reorganize and reformat the regulations to improve usability;
- Streamline and clarify the procedures for development;
- Restructure the district and use regulations; and
- Modernize the substantive standards of the regulations.

The following pages incorporate a discussion on each of these major themes and highlight key policy discussions where the recommendations include substantial policy changes.

1. REORGANIZATION AND REFORMATTING OF THE CODE

The City of Trotwood's current Planning and Zoning Code (Part Eleven of the Codified Ordinances) has been periodically updated over the years and maintains a reasonable sense of order, but the current regulations do make it somewhat difficult to determine what is allowed or required within each zoning district. The existing code is set up in a manner that was fairly traditional in the 1990s when the village, at the time, and Madison Township merged. However, codes have evolved since then with enhanced reorganization and supplemental graphics and cross-references to make the codes easier to use.

1(A) Consolidate Regulations into a Single Document without Separate Titles

The current code is divided into five different "titles," which are major divisions of Part Eleven of the Trotwood Codified Ordinances. The following is an overview of the titles:

- **Title One: Planning** – This title includes information on certain adopted plans, development fees, and the urban renewal ordinance.
- **Title Three: Subdivision Regulations** – This title includes all the regulations related to the subdivision of land and installation of public improvements.
- **Title Five: Zoning Administration** – This title includes the definitions for the code, and all information related to the Zoning Administrator and boards involved in the review of applications in Trotwood.
- **Title Seven: Zoning Districts and Regulations** – This title outlines all of the city's zoning districts and the uses that are permitted within each district
- **Title Nine: Supplemental Zoning Regulations** – This title includes a lot of the design standards (e.g., parking, signs, etc.) as well as the procedural standards for wireless communication facilities and violations.

The code also includes two appendices. The first is an appendix to Chapter 1185 (Signs), which includes illustrations of sign types and regulations. The second appendix, at the end of the document, is the table of permitted uses. This code audit recommends keeping the list of allowed uses in a tabular format, but it should be embedded into the document, rather than being an appendix.

From an organizational standpoint, there is no real reason to separate the entire Part Eleven into multiple titles. The first title references the adoption of certain plans and also includes a chapter on urban renewal. As noted in the next section, the language of this entire chapter should be relocated to other parts of the codified ordinances, or is not necessary at the level of detail included in the current code. Title Three relates solely to subdivision regulations, which are often seen as a distinct set of provisions related to legal subdivision of land that does not directly connect to the use of the property. However, there are some cases where the subdivision requirements may apply to land development when there is no actual subdivision of land into lots. For example, the subdivision regulations apply when someone is installing new public improvements (e.g., water lines, sewer lines, streets, etc.), which can apply to many developments without a subdivision. Also, more communities are mandating the installation of sidewalks for new development where they don't exist, even if there is no formal subdivision procedure required.

There is some overlap in the current format, with most of the language related to procedures and uses found in Title Five (Zoning Administration), with the exception that the procedures for subdivisions are found in Title Three (Subdivision Regulations). To make the new code as efficient as possible, the city should consider a complete reorganization of the code with chapters and sections that are reordered based on functions such as administration, development review procedures, zoning districts, and development standards (e.g., parking, buffering, lighting, etc.). The table on this page summarizes a proposed restructuring of the Trotwood Planning and Zoning Code. While most of the chapters are self-explanatory (e.g., architectural, landscaping, and signs), others will be chapters with general requirements that apply to most, if not all, development in the city. For example, the new Chapter 1101 (General Provisions) will include the overall purpose of the code, transitional regulations (described later), required compliance, etc. The new Chapter 1106 (General Development Standards) will include several sections of regulations that do not rise to the need of an individual chapter (e.g., fencing, lighting, and performance standards). This reorganization is not entirely different from the current code as the current procedures are already largely located in a single chapter, except for subdivision procedures. The reorganization does, however, make things more user-friendly for residents and investors alike, as residents are generally in need of information on accessory or temporary uses, while investors and businesses may be interested in certain aspects of land use or design.

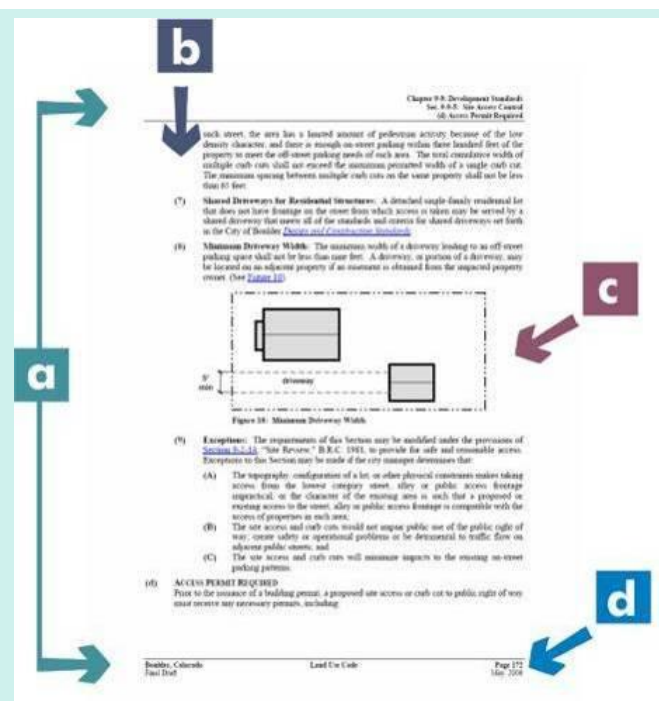
Part Eleven – Planning and Zoning Code	
Chapter	Chapter Name
1101	General Provisions
1102	Administration and Enforcement
1103	Zoning Districts and Principal Uses
1104	Planned Unit Developments
1105	Accessory and Temporary Uses
1106	General Development Standards
1107	Architectural Standards
1108	Landscaping and Screening
1109	Parking, Access, and Mobility
1110	Signs
1111	Subdivision Design & Public Improvements
1112	Nonconformities
1113	Definitions

1(B) Relocate the Existing Chapters in Title One (Planning)

As briefly mentioned on the previous page, much of the language in Title One (Planning) does not need to be located in the planning and zoning code. Chapter 1103 (Adopted Plans and Development Fees) outlines four specific planning documents that the city has adopted over time, and the referenced ordinance number under which they were adopted. This level of specificity may limit how the city's decision-makers can use other plans (e.g., strategic plan, park planning efforts, etc.) that are not listed. As an alternative, the new Chapter 1101 (General Provisions) should include a provision that any zoning decisions should be in accordance with plans adopted by the city, with generalized examples. This will allow the city to adopt updates to the existing plans or new plans without having to go through a text amendment to modify this chapter. The language related to development fees is good, and should be maintained in the manner written, but can be moved to the new section on common review requirements, that will be located in the new Chapter 1102 (Administration and Enforcement).

The existing Chapter 1105 (Urban Renewal) outlines the process the city may utilize to undertake urban renewal projects. While this language does have some relation to planning in Trotwood, it is not closely linked to the zoning process itself. Planning Commission and City Council are involved in such projects, but that is the limit of the regulations' connection to zoning and subdivision. Additionally, any changes related to this language would have to go through similar amendment procedures as a zoning amendment, whereas most communities simply have the City Council adopt the procedural requirements. The city should consider removing Chapter 1105 from the planning and zoning code and moving it to another part of the codified ordinances. One suggestion would be to update the language of the existing Chapter 1105 and then move it to Title Five (Other Public Services) in Part Nine (Streets, Utilities, and Public Services Code) of the codified ordinances.

1(C) Improve Referencing



Today's modern codes use a variety of techniques to orient the reader including (a) headers and footers, (b) legible text with headings and hierarchy, (c) illustrations, and (d) page numbers that combine for a user-friendly code that is easy to use and navigate.

A detailed table of contents, page numbers, and enhanced use of headers and footers on each page will make for much easier navigation through the new code. In addition, the updated code should include an expanded table of contents that breaks some of the chapters down further so users can quickly identify the locations of specific requirements, such as building permits or fencing requirements. The city should consider including a master table of contents at the beginning of the new code to make referencing topics simpler. In addition, an index by topics would be helpful in the back of the regulations for pinpointing the location of key topics within the text. The final step in the update process will be to review it for internal consistency and include hyperlinked cross-references among sections. Such hyperlinks should be active in any digital version of the codes so that users can easily click on the cross-reference and be taken to the appropriate section or graphic.

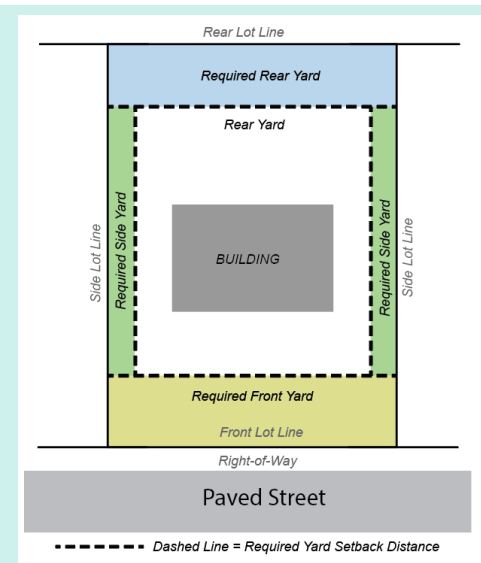
1(D) Illustrate Additional Key Concepts, Standards, and Processes

Modern development codes explain and summarize development standards, permitted uses, and procedures using tables, illustrations, and flow charts. Unfortunately, the current planning and zoning code does not appear to use any illustrations, except for older graphics found in Chapter 1185 (Signs) as part of the appendix to that chapter. There are numerous standards, such as setbacks, landscaping, signage, and parking, which would benefit from including graphics for clarity. In addition, illustrations and photos can often describe the required or desired relationships among development standards, adjacent uses, or dimensions more simply than words alone. Tables can also convey a wealth of information about uses and dimensional requirements in a few pages and vastly improve the readability of a code.

The revised regulations should utilize illustrations, graphics, photographs, and tables to explain complex concepts and summarize detailed information lists. In addition, the city should consider the use of additional tables, graphics, illustrations, and examples to help readers understand preferred forms of development.

All graphics, illustrations, and photographs used will be chosen or designed to allow for the easy reproduction of the new code.

Additionally, language will be included in the new Chapter 1101 (General Provisions) that will establish that the text of the regulations control in the case of any conflict.



Sample graphic illustrating the location of "required" yards (based on setbacks) as compared to the full extent of each yard.

1 (E) Eliminate Submittal Requirements¹

There are a couple of examples where the current regulations list the exact number of plans and information required as part of the city's review procedures (contents of applications). Not only does this add to the length of the regulations, but it also complicates matters when the city wants to amend the submittal requirements because the lists are part of the adopted text, and any change requires a text amendment. Therefore, this audit recommends that the specific application submittal requirements be removed from the new regulations and maintained as a checklist outside the code. This makes the code less cumbersome and ensures changes in application submittal requirements can be easily made without formal amendments to the code. Ultimately, the city could also move the applications and submittal checklists to digital formats that can be uploaded to the city website or emailed to potential applicants.

¹ POLICY QUESTION – Does City Council generally agree with the proposed reorganization and formatting changes suggested under this theme?

2. UPDATE ADMINISTRATIVE REVIEW PROCEDURES

One of the more important attributes of an effective zoning code is that the review procedures are efficient, logical, and easily understood. In particular, the board or department responsible for the review should correspond with the required level of review. Trotwood utilizes several procedural reviews in the administration and enforcement of its land-use regulations, but they lack enough clarity to let a typical reader understand the step-by-step processes and the criteria that staff and the boards use in making their decision.

2(A) Clarify Review Procedures and Establish Common Review Requirements

The trend in land-use regulations is to consolidate all procedural provisions into one main section. Consolidation enables the code user to locate, in one place, all procedures and the applicable review criteria governing each type of development review (e.g., permits, rezonings, conditional use permits, subdivisions, variances, etc.). The existing Trotwood Planning and Zoning Code already has largely accomplished this through the language in Title Five (Zoning Administration). The one exception, as noted on previous pages, is that the subdivision review procedures are located in a separate title. Per that discussion, the recommendation is to consolidate those procedures with the zoning procedures into a single chapter.

One of the critical parts of modernizing the procedures beyond consolidation is establishing clear review criteria for each procedure. For example, in the current Section 1129.02 and 1129.03 (Variances), the current regulations establish the basic review criteria that the Board of Zoning Appeals (BZA) uses to determine if a variance request should be authorized. Similar guidance is provided for conditional use applications, but is absent for others, such as zoning amendments or appeals. While, for example, in appeals, it may seem obvious what the BZA is considering, the code can be improved by clarifying that the major point of consideration is whether the Zoning Administrator made a decision compliant with the code or not. Good review criteria give the applicable review board a solid understanding of what they need to consider when making a decision, which can make for more defensible decisions. When updating the code, the city should incorporate some language that establishes what the applicable board considers when making a decision for all procedures established in the code.

Another suggested improvement is including a "common review requirements" section before the list of individual procedures. This introductory section will include important information that is relevant to all procedures. For example, this new section could include provisions covering such common topics as public notice and public hearing requirements, and who has the authority to apply. This section would also include the development fees language that was already noted as existing in the current Chapter 1103. Establishing this universal section will help prevent the code from repeating the same information for every procedure, which, in turn, minimizes the chance of inconsistent language.

2(B) Consider Allowing Planning Commission to Review Conditional Uses

The BZA is currently charged with reviewing conditional uses pursuant to the existing Chapter 1133. They have general review criteria and special standards for certain uses to help determine if the use is appropriate in the applicable zoning districts. In most Ohio municipalities, this role tends to go to the planning commission, as it ties into their overall role in planning for the community as well as their role in reviewing and advising on zoning text and map matters. However, for townships, the Ohio Revised Code establishes that a township BZA is the board with the authority to decide on conditional uses. Because the city is a result of the merger of the village and Madison Township, this may be why the BZA is identified as the board that reviews conditional uses.

As a reminder, a conditional use is simply put, a use that could be appropriate in a zoning district under certain circumstances, such as location on certain thoroughfares, increased buffers, or varied setbacks. Common

conditional uses in residential districts are schools, large recreational facilities, bed and breakfast establishments, and government buildings, all of which have significant impacts when compared to residential uses but may be appropriate nonetheless. We recommend that the city consider moving the authority to review and make decisions on conditional uses to the Planning Commission. Fortunately, this change does not appear to be limited by the current charter, as the charter language, which would supersede any zoning provision, does not specifically limit which board is responsible for such review, only that the City Council may establish appropriate authority for each board.²

2(C) Consider Incorporating an Administrative Waiver Procedure

One new procedure that the city should consider including is an administrative waiver procedure. This procedure would permit staff to modify a set of limited dimensional standards, such as setbacks, under a set of given criteria and in a limited manner. This type of authority saves an applicant the time and expense of applying to the BZA for minor variances. In practice, the provision has been most valuable to the average homeowner seeking a minor modification of dimensional standards, such as building a deck or fence. Typically, staff is authorized to grant these minor waivers only if the modification advances the code's purposes, results in fewer impacts, and relieves practical difficulties associated with an unusual site, similar to the variance review criteria. This procedure is not a waiver granted simply by asking for it. This authority is typically capped at a maximum percentage of change allowed, such as up to a 10 to 15% change in a quantitative lot dimension or area standard, but not for items such as the maximum sign area.³

2(D) Incorporate an Alternative Equivalency Procedure

The city currently has provisions for considering variances where an applicant can request a reduction or lowering of an established standard. The city might consider adding an "alternative equivalency" procedure that would allow an applicant to propose an alternative to an established standard that equals or exceeds the intent of the original standard. Instead of doing something less, an applicant may have a creative method of meeting the intent of a standard that is not a variance and would not meet the standard of practical difficulty or unnecessary hardship. For example, an applicant may suggest using a public art installation instead of screening outdoor storage with landscaping or a fence. The alternative equivalency review can be a valuable tool that could, for example, allow an applicant to propose a buffering, lighting, or architectural option that was perhaps not envisioned in the code language but would be a better solution. The Planning Commission would be the board responsible for this type of review as part of a public hearing. The review and decision would be specific to the site and the proposed alternative rather than setting a precedent. As with all review procedures, there should be review criteria for the Planning Commission to consider.⁴

2(E) Add Transitional Regulations

The current regulations do not fully address what happens to applications under review when the planning and zoning code is amended, and the updated regulations become effective. Therefore, this audit recommends incorporating a new section called "transitional regulations" within the new Chapter 1101 (General Provisions) that will help resolve the status of properties with pending applications, recent approvals, and properties with outstanding violations at the time the new code or future amendments are adopted. The provisions will allow an application, in general, to be processed under the rules in place at the time a complete application is submitted. Additionally, the transitional regulations section will include language stating that violations before the enactment of the revised code shall remain violations after the effective date of the regulation.

² POLICY QUESTION – Is City Council okay with allowing the Planning Commission to review conditional uses?

³ POLICY QUESTION – How does City Council feel about allowing limited types of small waivers to be reviewed by staff?

⁴ POLICY QUESTION – How does City Council feel about allowing this type of alternative equivalency review. Something that may be considered a "positive variance," where an applicant has a good idea that was not considered in the zoning language, but would not be a practical difficulty, a critical finding for traditional variances.

2(F) Eliminate the Design Review Board

The existing Section 1125.12 (Design Review Board) outlines the creation and purpose of the Trotwood Design Review Board (DRB) within the context of the zoning regulations. This section specifically cross-references the role of the DRB in the Salem Avenue Redevelopment Overlay District. However, with the actual overlay district language, there is no reference to the role of the DRB in reviewing development in the district. That cross-reference is to Section 1166.02, which mentions the staff and the Planning Commission's role in the review process. Related to design review, Section 1189.18 of the code contains the basic architectural design standards for new development in the city. This is a section that would generally be considered something a DRB would review; however, going back to the initial section on the board, there is no authority for the DRB to review general architectural standards.

While many communities do maintain design review boards similar to the city's current makeup, they are typically charged with specialty review procedures, especially as they may be related to historic preservation. For Trotwood, the current Planning Commission should be sufficient for administering any revised or enhanced design standards that will be incorporated into the updated code. For this reason, the city should consider eliminating the DRB.⁵

2(G) Include a Complete Application Provision

Part of the overall improvement to the new regulations will be clarifying the steps in various review procedures. To ensure accountability and responsibility for moving applications forward for the city and the applicant, the city should consider a "complete application" requirement. A complete application provision explicitly authorizes the staff to review submitted applications and decide if they are "complete" and should be formally accepted for further review and action. The provision, which would apply to all development applications, would state that no processing would begin on an application until after a formal determination by staff that such an application is "complete." Applications are complete when they contain all the required exhibits, including reports, maps, plans, and the required fee. Without such requirements, staff and decision-makers may waste time and effort reviewing incomplete applications only to re-review applications once any errors or omissions are corrected. Formally instituting this step can help prevent the city from processing incomplete applications, which is frustrating to staff, decision-makers, and applicants. Generally, if the staff determines an application is "incomplete" and therefore unacceptable for further processing, the staff is required to notify the applicant in writing of any deficiencies they find.

Typically, staff should have three to five days to review and decide that an application is complete. An applicant, in turn, would have a prescribed period to remedy the deficiencies and resubmit or risk rejection of the application and loss of the application fee. Staff can also have some authority to waive requirements if they are deemed inconsequential to demonstrating compliance with the code.

⁵ POLICY QUESTION – Is City Council okay with eliminating the DRB?

3. RESTRUCTURE THE DISTRICTS AND USE REGULATIONS

One of the critical goals of this project is to enhance the opportunity for development while also streamlining the city's land use regulations and implementing key recommendations of the comprehensive plan. One of the approaches to accomplishing this goal is to evaluate the existing zoning district structure (number and types of districts), where and how uses are allowed, and the specific standards that apply to those districts and uses. Since the districts are one of the core elements of the regulations, the city should consider the recommendations on the following pages.

If the city moves forward with some or all of these suggestions, the updated code should also include a transitional zoning district table as part of the new code. This table will identify how the zoning districts have changed between the versions of the two codes (e.g., eliminated, renamed, etc.). The purpose of this table is to have a formal reference in cases where, in the future, the city or an applicant may come across a reference to an old zoning district in another document, but cannot correlate that district to one in the new development code.

3(A) Consider Revisions to the Existing Zoning District Structure

Trotwood has a large number of zoning districts compared to similar cities, but they all generally serve an appropriate purpose. However, there are some internal changes to each district that will improve the code and make it easier to invest in the city while meeting the city's comprehensive plan goals for the character of development. Following a review of the existing zoning districts, the uses allowed in each district, digital maps of the city, and the standards applied to development (e.g., lot area, setbacks, lot coverage, building size, etc.), it appears that there is an opportunity to make a few changes to enhance the district structure and help implement critical recommendations of the comprehensive plan.

The table below includes two columns where the column on the left has the list of existing zoning districts, and the column on the right identifies suggested changes, primarily in name, to clarify the intent of the district in the name. Any significant internal changes to each district are further discussed in the paragraphs following the table.

Existing Zoning Districts	Proposed Zoning Districts
Agricultural (A)	Agricultural District (AG)
RE-Rural Estate District (RE)	Rural Estate District (RE)
Residential Single Family-Low Density(RSF-L)	Residential Single-Family (Low Density) District (RSF-L)
Residential Single Family-Medium Density (RSF-M)	Residential Single-Family (Medium Density) District (RSF-M)
Residential Single Family-High Density (RSF-H)	Residential Single-Family (High Density) District (RSF-H)
Residential-Two Family (R-TF)	Residential Limited Attached District (RLA)
Residential Four Family (R-FF)	
Residential Multi-Family-Low Density (RMF-L)	Residential Multi-Family-Low Density District (RMF-L)
Residential Multi-Family-High Density (RMF-H)	Residential Multi-Family-High Density District (RMF-H)
Mobile Home Park (MHP)	Mobile Home Park District (MHP)
Office Residential (O-R)	Office Residential (OR)
Neighborhood Business (N-B)	Neighborhood Business (NB)
Olde Town Business (OT-B)	Olde Town Business (OTB)
General Business (G-B)	General Business (GB)
Regional Business (R-B)	Regional Business (RB)
Business Park (B-P)	Business Park (BP)
Business-Industrial Campus Park District (B-I)	

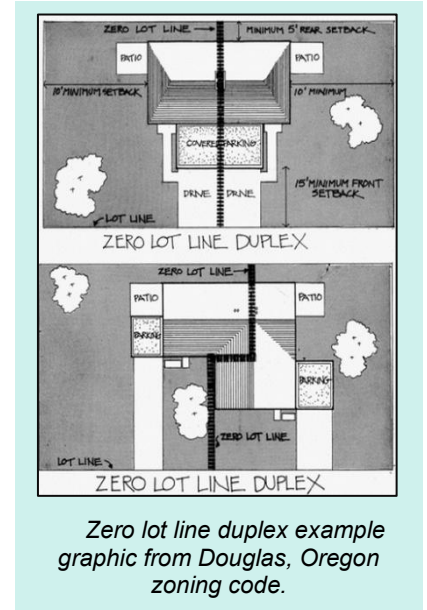
Existing Zoning Districts	Proposed Zoning Districts
Light Industrial 1 (L-I-1)	Light Industrial District (LI)
Light Industrial 2 (L-I-2)	General Industrial District (GI)
Park/Open Space District (P/O-S)	Community and Public Facilities District (CPF)
Planned Unit Development (PUD)	Planned Unit Development (PUD)
Salem Avenue Redevelopment Area Overlay District	Salem Avenue Redevelopment District (SAR)

The following are descriptions of the significant changes suggested for the zoning district structure and related site development standards (lot area, dwelling size, setbacks, building heights, etc.). Please note that these are preliminary recommendations; there may be more adjustments to the proposed lot area requirements and other standards as the city and consultants dig deeper into existing development.

- Agricultural District** – The current Agricultural District apparently was drawn from the Madison Township zoning requirement that existed prior to the merger. The minimum lot area requirements are unusual in that there is a minimum lot area of five acres for all uses, except single-family homes, which require 20 acres. It seems clear that the intent of these provisions was to encourage agricultural uses while minimizing the cutting up of large farms into five-acre lots. However, technically, the way the text is written now, if someone had a legitimate farm operation on, for example, seven acres, they could not live on that same lot because they do not have the minimum 20-acre lot required for a single-family home. Additionally, in recent years, as some farms have retired, they have sought to split their homes off of larger properties so they can remain in their homes, but sell the farm. This has generally been allowed because the city does not want to force people to move, but it negates the original intent. For this reason, the city should either require a minimum lot area of five acres for any permitted use, including single-family homes, or require a larger lot area for all uses.⁶
- Residential Single Family-High Density District** – One of the critical recommendations of the Trotwood Together Comprehensive Plan was to modify the zoning around areas designated as “core neighborhoods.” These are some of the oldest subdivisions/neighborhoods in Trotwood that are adjacent to the City of Dayton and are the areas currently zoned as Residential Single Family- High Density (RSF-H). As noted in the plan, one of the major issues with this zoning district, in particular, is that it requires a 10,000 square foot lot, when the vast majority of lots in this district are closer to 5,500 to 6,500 square feet in size. Per the recommendation of the comprehensive plan, the city should consider allowing changes to this district to “right-size” the zoning to reflect current lot sizes and common setbacks. The purpose of this is to allow people to easily invest in these lots without having to deal with the nonconforming use provisions. The recommendation would include reducing the minimum lot area to 5,500 square feet and then slightly reducing the setbacks to reflect the common setbacks in the area. This will make a significant number of existing lots conform to the zoning.
- Residential Limited Attached District** – The city currently has the Residential-Two Family and Residential-Four Family Districts in limited areas. This code audit includes a recommendation to consolidate these into a single district that allows for these very limited types of attached housing (two to four units) with the ability to incorporate more form-based housing types that target specific types of housing products (duplexes and rowhouses). This approach is described further on page 14 of this document and focuses on the types of housing products and appearance. The current density allowances would be maintained.

⁶ POLICY QUESTION – How does City Council feel about changing the minimum lot area in the Agricultural District?

- In addition to modifying the lot area and setback requirements, the comprehensive plan also recommends allowing for zero lot line development in this district. Such a development type would be listed as a specific use type in the permitted use table. Zero lot line developments are where homes are built with one wall along the lot line (no setback). This means that homes can all be shifted to one side of a lot, providing a much wider separation of buildings rather than having the homes in the center of the lots. It also provides for the opportunity to build attached units, with the shared wall along the lot line. The result of that is that the building may look like a two-family dwelling, but each unit can be separately owned.⁷



- **Industrial Districts** – While it is not a significant policy change, the city should consider allowing for the renaming of the two light industrial districts, which are currently titled as “light industrial district,” with only the number as the distinction (L-I-1 and L-I-2). This can be a little confusing, as there is a purpose for having the two distinct districts, with the L-I-2 allowing for slightly more intense uses. As such, this audit recommends renaming the districts as the Light Industrial District (LI) and the General Industrial District (GI), respectively. Furthermore, the one substantial recommendation for all of the industrial districts is to allow for an increase in building height. The current zoning code limits all industrial buildings to a maximum of 35 feet, whereas many modern industrial buildings can far exceed that height. The maximum height for these districts should be increased to at least 50 feet, unless the fire department authorizes taller buildings based on the ability to address any fires or emergencies.
- **Business Park District (BP)** – The city currently has two districts where the purpose is to allow for a broad mix of commerce uses in a business park setting. These districts are the Business Park District (BP) and the Business-Industrial Campus Park District (B-I). The two districts are close in nature, with the BP District allowing for a broader set of uses. That being said, currently, there is only one site zoned B-I, and that is the old Salem Mall property. Given the opportunity for that site to be developed for a broader set of uses, including potentially commercial operations, this code audit recommends consolidating the two districts into a single business park district. The land uses allowed in this district and in the Neighborhood Business District both need to be comprehensively reviewed because both districts have a very restrictive list of uses that are allowed. There may be other approaches to allowing a broader range of uses, including establishing special use-specific setbacks or maximum building sizes (neighborhood business district only).
- **Planned Unit Development (PUD)** – Like many communities, the city has a PUD district that provides an option for developers to approach the city with a large-scale development proposal that would not necessarily be accommodated through other existing zoning districts. The PUD typically results in a negotiated set of zoning standards based on a specifically approved plan for the site. While the current approach to the PUD is not unusual, there are a number of areas where the district can be improved, including the following considerations:
 - There is some confusion between the existing text of Chapter 1140 (Planned Unit Developments) and the zoning map. The text alludes to PUDs “in residential districts” or in “commercial districts,” etc., with additional language that connects back to the existing base zoning district. However, it is clear that the PUD District is a stand-alone zoning district where land is rezoned to a PUD, so it is no longer “in” any district; it is just rezoned to a PUD. At the same time, the zoning map seems to clarify that issue by referencing a Business PUD (B-PUD), a Residential PUD (R-PUD), and an Industrial PUD (I-PUD), even though those three particular types of PUDs and abbreviations are

⁷ POLICY QUESTION – How does City Council feel about reducing the lot size requirement for only the RSF-H District while also allowing for zero lot line developments in this district?

not mentioned in the code text. To clarify this, the updated text and map should simply reference the PUD District. The existing text can be expanded to note how any PUD should be in accordance with the comprehensive plan, which will help guide the uses allowed, and continue to be clear that the Planning Commission and City Council can adjust what uses are allowed in an individual PUD

- The current process for a PUD approval requires a preliminary plan approval (at the same time as the zoning amendment review) and a final plan approval. This two-step approach is common to many communities; however, the current regulations require approval by both the Planning Commission and City Council at public hearings for both plans. This level of review is typically not necessary because the vast majority of major policy decisions related to the PUD are made as part of the preliminary plan/zoning amendment approval, which has to go through the hearing process. This means that the final plan is more of a site plan review to ensure that the final plan and any subsequent zoning approvals are approved in accordance with the preliminary plan. For this reason, many communities only require the final plan to be administratively “checked” by the Planning Commission, with approval as part of a public meeting rather than a public hearing. This somewhat modified approach simplifies the procedure without losing out on public input and major decisions by both boards. It simply ensures that the majority of work is completed as part of the preliminary plan review, and the final plan is just a formal step to make sure the technical specifications of the development follow the approved preliminary plan.
- The current PUD provisions have a reasonable amount of specific language related to allowed uses, densities, and other design requirements. These provisions should be updated and enhanced to bring in more language from the comprehensive plan that specifies how land use densities may be limited based on location or architectural design. As noted in the plan, one concept of clarifying the city’s policy on land use density is to set out explicitly requirements that for higher density development, there needs to be an elevated design requirement. These changes will help establish clear standards for what the city expects from any new PUD application.⁸
- **Community and Public Facilities District (CPF)** – The city currently has a district called the Park/Open Space District (P/O-S). While the name implies the purpose of this district is to identify and allow parks and open space, the actual list of uses allowed is broader, and accommodates a multitude of public uses. For this reason, the city should consider renaming this district to the Community and Public Facilities District, and potentially consider allowing additional public and institutional uses within the district, including school. This would allow for any large public or institutional campus to be zoned as such, easily identifying on zoning, and allowing the district to address the unique requirements of such uses within the site development standards.
- **Salem Avenue Redevelopment District** – The current SARO District is intended to create a unified set of design and use standards for the core area around the Salem Road/Shiloh Springs Road intersection. The overall intent of the district is good, but there is a need to clean up the procedures and review criteria as noted earlier in this code audit (e.g., clarifying the role of the Planning Commission and/or DRB). However, given the recommendations of the comprehensive plan and the overall purpose of this overlay, as written, the recommendation is to change the zoning of this area to a base zoning district and eliminate the overlay zoning district. Making this a stand-alone district would allow for the new code to craft a district very specific to the recommendations of the comprehensive plan related to mixed-use development and design that can also accommodate the wide variety of uses that are already authorized by the overlay district and base zoning districts.⁹

⁸ POLICY QUESTION – How does City Council feel about the overall suggestions for changes to the PUD District?

⁹ POLICY QUESTION – Does City Council have any opposition for moving forward with a code update with the idea of making this district a base zoning district, with specific regulations connected to the recommendations of the plan? The district could be changed back to an overlay district later in the process if the text revisions do not appear to provide the necessary precautions for this area.

3(B) Consider Reduction of Minimum Dwelling Sizes in Certain Districts

One of the considerations of the comprehensive planning process was how to encourage housing investment in a way that still allows the city to ensure quality development. In particular, the city wants to make sure that it is not the city where developers target lower-quality developments. In the current code, the approach was to establish minimum dwelling unit sizes that, in some cases, reach a minimum dwelling size of 3,000 square feet of floor area. While many communities also have minimum dwelling size requirements, Trotwood's are some of the highest, especially in the Agricultural and Rural Estate Districts. As noted in the comprehensive plan, the city needs to consider the balance between minimum dwelling sizes, market demand, and the cost of housing when setting these standards. In current markets, even homes in the 1,200 square foot range are going to cost more than \$250,000 as a base starting point. Additionally, the higher dwelling size requirement will rule out many patio home housing types that are highly valued in the current market. As such, the city might consider modifying its minimum dwelling size regulations, as illustrated in the table below, to still maintain a requirement, but allow for a more reasonable dwelling size that is also reflective of the typical single-family home size being constructed across the state. For some of the districts (e.g., the RSF-H), the recommendation is based on the typical existing housing size to allow people to rebuild homes of similar sizes on the smaller lots.

Zoning District	Dwelling Size Requirement (Sq. Ft.) ¹⁰	
	Existing	Proposed
Agricultural (A)	1,600	1,200
RE-Rural Estate District (RE)	3,000	1,200
Residential Single Family-Low Density(RSF-L)	2,000	1,200
Residential Single Family-Medium Density (RSF-M)	1,600	1,00
Residential Single Family-High Density (RSF-H)	1,200	750
Residential-Two Family (R-TF)	1,100	750 per unit
Residential Four Family (R-FF)		
Residential Multi-Family-Low Density (RMF-L)	1 Bedroom – 700	1 Bedroom – 650
Residential Multi-Family-High Density (RMF-H)	2 Bedroom – 900	2 Bedroom – 750
	3 Bedroom – 1,000	3 Bedroom – 900
Office Residential (O-R)		

3(C) Clearly Define and Reorganize Permitted and Conditional Uses

The city currently illustrates how primary land uses are allowed in each district through the use of a use table that is included in Appendix B of the code, with a portion of it illustrated in the figure below. This is an approach that most modern codes utilize, and therefore, the city should maintain this approach. However, this audit recommends that the use table be incorporated into the chapter on zoning districts and principal use regulations rather than as an appendix, as it better connects the purpose of the zoning districts with the principal uses allowed. Such a move will also allow for the addition of new information to help explain how the table is to be used and the meaning of each acronym. The city should consider expanding this table somewhat to include a column that allows for the cross-reference of any use-specific standards. For example, Section 1133.04 (Conditional Uses) of the current code has some specific standards for certain uses, such as car washes and convenience retail stores. There is no clear way to know that those special standards would apply if you are just reviewing this table; however, reformatting the table will allow for a direct cross-reference to those special standards.

¹⁰ POLICY QUESTION – How does City Council feel about the suggested modifications to the minimum dwelling size requirements?

Commercial Uses																			
Primary Land Use (P - Permitted Use) (C - Conditional Use)	Zoning District																		
	P/O-S	A	RE	RSF-L	RSF-M	RSF-H	R-TF	R-FF	RMF-L	RMF-H	OR	OT-B	N-B	G-B	R-B	B-P	B-I	L-I-1	L-I-2
Retail, Small-Scale												P		P	P				
Retail, Wholesale														C	P	C			
Shooting Range																			
Smoke Lounge																			
Smoke Shop																			
Social Club															P	P			
Truck & Trailer Sales & Service																			
Veterinarian Office, No Outdoor Kennels															P	P			
Veterinarian Office, Outdoor Kennels															C	C			

Industrial Uses																			
Primary Land Use (P - Permitted Use) (C - Conditional Use)	Zoning District																		
	P/O-S	A	RE	RSF-L	RSF-M	RSF-H	R-TF	R-FF	RMF-L	RMF-H	OR	OT-B	N-B	G-B	R-B	B-P	B-I	L-I-1	L-I-2
Commercial Cleaning																		C	P
Concrete / Asphalt Production Facility																			C
Contractor's Office														C	C			P	P
Contractor's Yard																		C	P
Distribution Facility																C	C	C	P
Food & Beverage Production															P			P	P
General Industrial Production																		P	P
Hazardous Materials Production & Storage																			C
Light Industrial Assembly & Distribution																C	P	P	P
Marijuana Cultivation Facility																			
Marijuana Processor Facility																			
Microbrewery / Artisan Distillery																P	P	P	P
Mineral Extraction																			C
Mini Self-Storage Facility																			
Power Generation Facility																			
Recycling Center																			
Research & Development															P	P	P	P	P
Truck Stop / Travel Center																			
Truck Terminal																		C	P
Warehouse																		C	P
Waste Disposal Facility																			C
Wastewater Treatment Facility																			

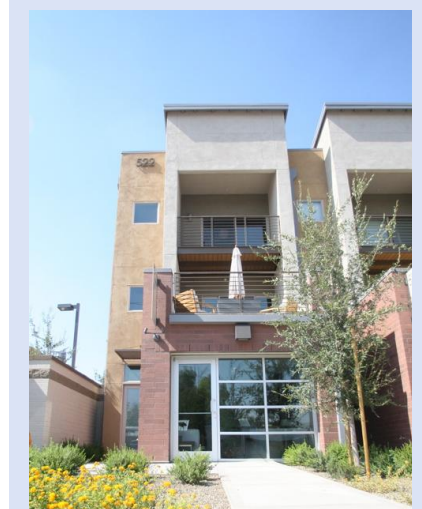
Above is a partial example of the city's existing primary land use table, located in Appendix B.

The city might consider incorporating more form-based development concepts, particularly in the higher-density/intensity districts such as the R-TF through RMF-H Districts, or the Planned Unit Development Districts. Form-based regulations are where the building form, setback, and general character of the structure are more of a priority than the specific land use. It is essentially setting out the visual expectation for the use in addition to the use itself. For example, instead of simply stating that multi-family residential uses are permitted in the RMF-L District, the new use table might list specific types of attached housing types permissible (e.g., rowhouses, apartment houses, apartment buildings, four-plexes, etc.) and then make it as easy as possible to develop the most desired types of buildings (note that the use itself is still multi-family residential).



Upper left image is an "apartment house" that looks like a large single-family home but accommodates 4 to 6 units. Upper right is a traditional set of rowhouses. Lower left image illustrates multi-family uses that are commonly called court or garden apartments while the image on the lower right is a traditional apartment building. All are forms of multi-family dwellings.

Finally, when updating the list of permitted principal uses, the city should consider opportunities for allowing use types that are becoming more common in places like Trotwood. On previous pages, this code audit includes recommendations for a variety of housing types, but a growing number of communities are specifically addressing breweries and distilleries (in both commercial and industrial settings), tiny homes, short-term rentals, tattoo parlors, and live/work opportunities. Such uses are common in both commercial and industrial areas in other cities. Live/work opportunities are a type of use that was common in the 1950s and 1960s and has become popular again. They are homes being used for both business and residential uses, but the business is a primary focus of the building, unlike home occupations. They are typically only allowed in nonresidential zoning districts, as a way to encourage mixed-use developments in areas that have previously only been zoned for commercial uses. The city may already have some type of this development in the low-intensity commercial districts, which are transitional in nature, but there are opportunities to open it up as a mixed-use opportunity in other districts. Additionally, the city should expand on how to allow mixed-use buildings as a permitted use in the current business districts, where apartments could be allowed on the upper floors of dwellings. This was a recommendation of the comprehensive plan for targeted areas. This approach could provide new business investments in these districts while also creating more housing options for the city as a whole. Finally, this is also an excellent opportunity to look back at recent inquiries into the city's zoning to see if uses such as dog grooming, doggy daycares, tattoo parlors, etc., would be appropriate in particular districts or to clarify that they are prohibited.



Above is an image of live/work units where the business is a prominent feature of the first floor.

Other changes to the list of allowed uses will be considered as part of the line-by-line review of the draft text. Staff has already identified certain uses or regulations for principal uses that need to be incorporated, including how to address large “barndominium” type housing, or homes with attached garages that can dwarf the residential part of the home. The city will also need to consider how to accommodate certain industrial activities in the agricultural district, as discussed in the comprehensive plan, which includes a range of agricultural-related uses.¹¹

3(C) Clarify Accessory and Temporary Use Standards

One of the significant issues identified with the current code is accessory uses and structures. This is not unusual because, regardless of whether a community has room to grow or is entirely built up, every community constantly deals with accessory uses. The existing code contains minimal regulations for some accessory uses, but they are vague with limited conditions, and those regulations that exist are scattered throughout the existing document in both the zoning district regulations and in the supplemental regulation of Title Nine. The updated code should consolidate all of these regulations within a single chapter because it is easy for residents to go to one chapter to find all the applicable requirements on how they may want to construct an accessory building, pool, fence, etc. In updating the regulations, the city should consider the following:

- All the regulations need to be reorganized to clarify where and how each accessory use is permitted within each zoning district. This reorganization will be accomplished by creating a use table for accessory uses similar to the type proposed for principal uses, as discussed earlier. This approach will ensure consistency in terms and standards regardless of the zoning district.

¹¹ POLICY QUESTION – How does City Council feel about the suggested modifications to list of uses allowed? Additionally, how does the city feel about the potential for data centers, industrial scale agriculture (large greenhouses or enclosed structures), or similar uses, in the agricultural district?

- The standards should establish clear rules for the most common accessory uses, such as satellite dishes, swimming pools, and detached structures. Additionally, the standards will be updated to reflect current state and federal laws, for example, exempting small satellite dishes under one meter in diameter or providing for amateur radio towers.
- The regulations in the current code need to be revised and updated to address ongoing issues, such as setbacks for various accessory structures and whether the setbacks for swimming pools are too extensive (current setback is 15 feet, when many communities allow for a ten-foot setback).
- The entire set of regulations related to accessory uses and buildings in Trotwood is generally outdated. There are general references to typical accessory buildings (garages and sheds), but no clear standards for other types of structures, such as patios, porches, and decks. Additionally, the maximum size is not allowed to exceed 50% of the footprint of the principal building, which may be limiting for older homes. A typical two-car detached garage can be 500 square feet alone.
- The city does not have much by way of accessory use regulations for nonresidential uses. This is common in older codes, but overlooks some common modern accessory uses such as donation drop-boxes, outdoor dining areas, outdoor storage, and outdoor sales areas. These should all be addressed as part of the enhancements to these regulations.
- The city does not appear to address an increasingly popular accessory use, which is accessory dwelling units. Accessory dwelling units are smaller, secondary units that are allowed on the same lot as another home. They are often referred to as granny flats or in-law suites. There are ways to allow for this type of dwelling without substantially changing the densities of the areas where they are allowed. Accessory dwelling units were part of the housing discussions during the comprehensive planning process, where people generally liked the concept, but understood there would be a need to establish clear provisions of when and how they are allowed. Those who participated in the plan also appeared to support requiring that the property owner live in one of the dwelling units, as a way of maintaining some level of home ownership.¹²
- The current code does currently have a fairly robust set of regulations for temporary uses, found in Section 1189.09. These regulations should be updated to ensure they are still in line with how the city wants to address such uses, and then carried forward into the new code.



Above are examples of a detached accessory dwelling unit (top) and attached accessory dwelling unit (bottom).

¹² POLICY QUESTION – Is the City Council okay with incorporating some limited provisions for accessory dwelling units into the new code?

4. MODERNIZE THE SUBSTANTIVE STANDARDS

Another major theme in updating the city's regulations is revising the development standards (e.g., signs, parking, landscaping, etc.) to ensure a certain level of quality of development in the city without creating a significant burden on housing costs or business investments. Additionally, it is important to make the various standards clear and predictable. As described earlier in this section of the report, the proposed strategy is to enhance standards and then streamline the review for those applicants who meet all the standards. For those who want to vary the standards or approach development in a different manner, the applicant will have to go through various review boards depending on their specific request.

4(A) Revise the Existing Development Standards

The following are some development standards that the city currently has that could be improved or otherwise changed as part of a code update:

- **Architectural Standards**

Trotwood has some well-established architectural requirements, especially as it relates to single-family dwellings and, to some degree, development in the Salem Avenue Redevelopment Area Overlay District. The most restrictive of those standards applies to single-family residential uses where 50% of every facade has to be covered in “brick, stone, or other permanent natural material...” This is one of the strictest residential requirements for communities across Ohio. While many communities are concerned about the appearance of homes from the street perspective (front and side), there is rarely a restriction on the rear facade. Additionally, the requirement that the materials have to be “natural” means that builders can not use Hardiplank (a cementitious fiber material), or brick/stone veneers that look and feel like brick or stone, but do not have the same level of cost. It is unclear from the language whether wood would qualify as a natural material, but we are assuming that it could be. While it is understandable that the city wants to ensure quality development, this specific standard will likely prevent nearly all new housing development due to the cost aspect. Pursuant to the recommendation of the comprehensive plan, the city should consider the following changes to balance the goal of the current standard with the need to address housing costs:

- Maintain the requirement that 50% of the front facade of any dwelling be constructed of brick, stone, wood, or other natural materials, but also allow for Hardiplank and brick/stone veneers that are similar in look and feel to natural materials. The language specifically notes that vinyl, which looks like these materials, does not count toward that minimum.
- Allow all other facades to be constructed of any materials, with the caveat that additional standards should be added to specify a minimum thickness requirement for vinyl so that only the highest quality vinyl siding may be an option.
- The above standards should be used for all types of residential dwellings, not just single-family.
- The architectural standards should not apply fully to the suggested modifications to the RSF-H District, where there are a lot of existing homes, and most development will be infill in nature. For that specific district, the city should allow for the use of any of the higher-quality materials, including vinyl, if that is the predominant material along the same block face. This would mean that if someone builds a new house surrounded by all vinyl homes in this one district, the new home could be all vinyl. However, if all of the surrounding homes are brick, then the new home would also have to be constructed of brick.
- For PUDs or certain districts where densities may exceed a certain specified density, such as four units per acre, the architectural requirements may be increased. For example, in PUDs, if an applicant wants attached housing types or a density over four units per acre, they will need to meet material requirements for other facades, not just the front.

- New standards should be added for multi-family developments. While there are not a lot of new areas where multi-family is allowed, pursuant to the comprehensive plan, where they are, the city can incorporate new provisions that will ensure that the applicant cannot just build a basic square box with a little brick or stone on the front facade. They will need to include architectural features such as porches, bay windows, or other features to enhance the design.

In addition to these design standards, the city can look to enhance specific architectural design standards for nonresidential uses, especially for the Salem Avenue area or where more intense development may occur.¹³

- **Parking and Access Standards**

This code audit identifies several recommended improvements to the existing parking and loading requirements throughout this document. However, as with many standards, the city can be more progressive with regard to parking. The current regulations are typical of most communities, with a minimum number of spaces required and minimum setbacks for parking areas. One new approach that is growing in popularity is where the code eliminates the parking space ratios for the majority of businesses, but requires an applicant to demonstrate they have enough parking for the nonresidential use as part of the submission.

Regulations will be included that will give the staff sufficient leeway to deny the application based on the amount of parking suggested through the use of common background materials from various planning and engineering sources. Given that most businesses want to have a decent amount of parking, and many financial institutions require it as part of any funding, a business is already likely to locate only where parking is available. There is no significant need for listing specific parking ratios in a zoning code. Parking requirements for residential uses will still be included with some updates. In addition to updating the parking requirements, the city should incorporate standards for drive-through facilities (location and waiting space length) for more uses than banks, and might want to consider adding guidance for bicycle parking requirements to encourage safe bicycling parking options. The updated regulations should also address electric vehicle charging stations and potentially ridesharing stops.



Illustration of porous pavement used in a parking lot to allow stormwater to pass through the pavement.

One additional parking provision that the comprehensive plan recommends should be revised is that all new dwellings are required to have an attached two-car garage. A two-car garage can be an expensive addition to a building, especially if the requirement applies to areas where attached garages are not common. Furthermore, the current housing market will typically demand that the garage be attached. But if lot sizes or infill do not accommodate it, then driveway parking should be sufficient. Again, this is a standard that is very unique to Trotwood, where most communities do not mandate attached garages, let alone enclosed parking spaces.¹⁴

¹³ POLICY QUESTION – Is the City Council okay with this modified approach to architectural standards?

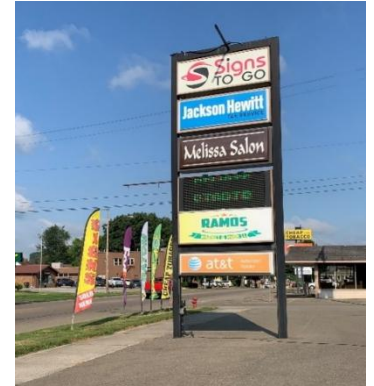
¹⁴ POLICY QUESTION – Is the City Council okay with this change in approach to parking standards?

- **Landscaping and Buffering**

The city has some basic landscaping and screening standards in Chapter 1175, which include preservation of existing trees. No significant issues have been identified with this chapter; however, there are some areas where the regulations can be cleaned up and clarified. There are also several places that would benefit from the addition of graphics. These changes should also be done in a way that gives flexibility in meeting the standards, as well as allowing such landscaped areas to serve as natural stormwater management systems. See later discussions about both issues. It is important to note that staff have recently worked on updating these regulations, but paused the update to allow for consideration of changes as part of this comprehensive code update. Those draft regulations will be considered for incorporation into the updated code.

- **Signage**

The sign regulations of Chapter 1185 will require work to help clarify what types of signs are allowed while also addressing some legal issues. In 2015, the Supreme Court ruled on a sign case that made it almost impossible for a city to regulate a sign based on the message. This means that the city can no longer have different rules for “directional and circulation signs” or “signs for properties for sale or lease”, and other message-based signs, as the regulations do now, because the only way to administer the rules is to look at the message of the sign. Fortunately, the city does not have a significant number of sign types that are based on the message, so there will not be a need for a complete overhaul. As we work through the update of the sign chapter, we will work closely with the Law Director to make sure that the sign regulations comply with case law while also meeting the needs of the city. In addition to the legal changes, the entire section should be updated with graphics and a simpler approach to clarifying which class of signs is permitted in each district. Finally, the update of this chapter should reassess the amount of signage allowed in each district, based on historic applications and approved variances. It appears that the amount of ground signage and building signage allowed is on the lower side of common practice. The consultants and staff will work together to determine the best ratios to use in order to achieve the desired visual character (minimize visual clutter) with the appropriate level of signage needed for reasonable business promotion.



4(B) Add New Development Standards

In addition to modernizing and expanding existing development standards, there are a number of new development standard types the city might want to consider incorporating into a code update, including:

- **Infill Compatibility Standards**

One of the biggest issues with the city's current standards is that there are a lot of development standards that are applied in a one-size-fits-all manner across a large swath of a single zoning district, even if development occurred at very different times. For example, there are areas in the residential zoning districts where none of the homes meet the front yard setback because the homes were built before there was zoning. The same can be said about all building setbacks, accessory buildings, building heights, etc. The city should consider incorporating infill compatibility standards to help build tailored dimensional standards without having to create numerous zoning districts. The city has some of this, where they allow adjustments to the front yard setback, but expanding these types of provisions will help encourage reinvestment in built areas. These would be a general set of standards that would allow an applicant to construct a building that reflects the predominant site characteristics of buildings in the same block without getting a variance. This may also be helpful in limited situations where the required dwelling sizes are substantially larger than what is on the ground nearby. This approach should help reduce variance requests, encourage reinvestment, and ensure compatibility within a specific block rather than across an entire zoning district.

- **Green Infrastructure**

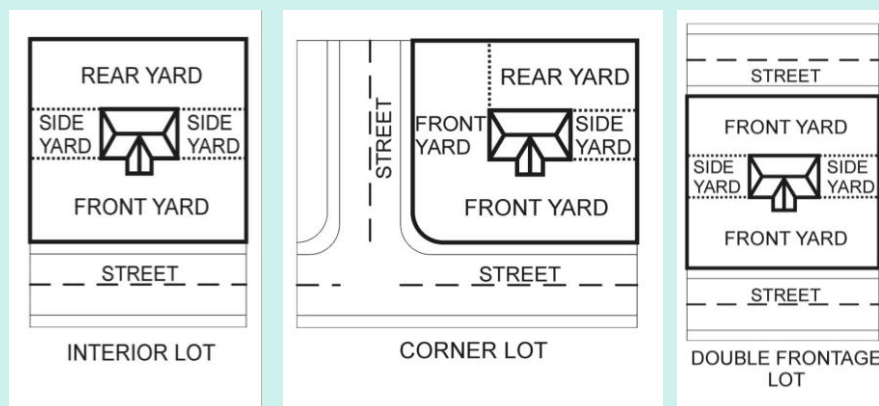
Since the code update includes modifications to the subdivision regulations, now is the time to determine if the city wants to encourage or require various elements of green infrastructure or sustainable development. Simply put, green infrastructure is where natural areas or natural processes are utilized to deal with things like stormwater runoff as an alternative to gray infrastructure, which includes culverts, pipes, and other manmade forms of infrastructure. Examples of green infrastructure include utilizing pervious pavement (not typically allowed for streets but possible for sidewalks), encouraging the use of more native vegetation that can minimize erosion, or allowing for the installation of rain gardens or bioswales that are natural areas designed to accommodate stormwater runoff. Options for green or sustainable development included provision for the use of pervious pavement on private property, green roofs, and grass swales in landscaping. If the city wants to work towards accommodating greener infrastructure options or more sustainable development options, the consultants will work with the City Engineer and staff to determine acceptable forms of green infrastructure and the best practices that should be applied through standards.

4(C) Flexibility for Some Design Standards

The city has a mix of development types and intensities that range from urban and compact to suburban and industrial. Because of the range of development intensities, this audit recommends incorporating some flexibility in the design standards that will provide for distinctions between more urban (e.g., Olde Town), compact development, and areas that are more suburban in character. For example, the landscaping, and particularly the screening standards, should provide options for meeting any of the requirements so that someone building a compact development in the older areas of Trotwood is not required to have wide buffer yards because the standards are one-size-fits-all. On the other hand, a large commercial complex with multi-family apartments behind it might not need as extensive screening if there are wider setbacks and more vegetation. Wherever possible, the standards should be written to be predictable and easy to interpret, yet include some flexibility to encourage more creativity in design.

4(D) Clarify Rules of Measurement

As suggested throughout this code audit, the revised code should list all dimensional requirements in a summary table (e.g., density requirements, building heights, setbacks). In addition, the code should contain a section devoted to rules for measuring dimensions. Such rules should be explicit (e.g., to measure a setback, the rules might state, "measure from the furthest projection of structure and any abutting right-of-way line"), and exceptions and permitted encroachments should be clearly defined. There is currently minimal guidance on how the city measures specific requirements, and this type of section can be greatly beneficial to the interpretation of the code.



Illustrations such as these help code users understand how yards and setbacks are measured for various lot types.