



Growth Management Strategy ULDC Diagnostic Review

Ascension Parish, LA | September 30, 2021



KENDIG KEAST
COLLABORATIVE

Bret Keast, AICP | CEO & Owner

Tareq Wafaie, AICP | Project Manager

Tonight's Agenda

- Project Overview
- Growth Management Summary
- ULDC Critique and Recommendations
- Phase 2 implementation overview
- Q&A



Project Overview

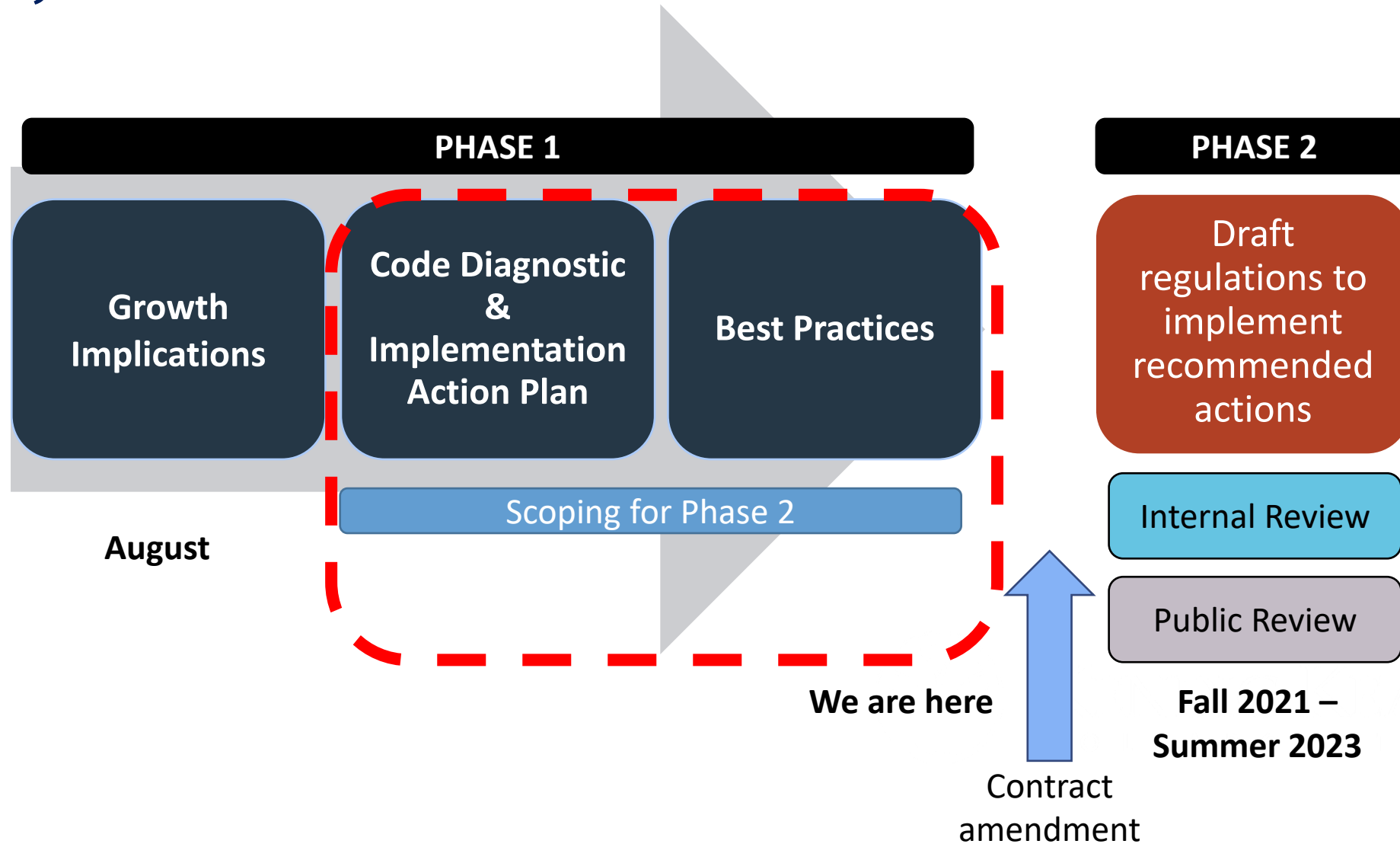
Project Description and Goals

- Consider growth management policies appropriate for the Parish
- Critique code for effectiveness at managing growth
- Identify gaps, overlaps, and inconsistencies among Parish policies and ordinances as they relate to growth management
- Incorporate best practices into growth management recommendations
- Prioritize targeted code updates to implement policies prior to expiration of 9-month moratorium



Project Overview

Project timeline



Finding the “Sweet Spot”

NO GROWTH

Difficult to manage

**Negative economic
impacts**

Unrealistic



RESPONSIBLE GROWTH

SUSTAINABLE GROWTH

FISCAL RESPONSIBILITY

**Protect community
assets and character**

**Direct growth to
appropriate areas**

**Economic benefits
without budget
depletion**

UNCHECKED GROWTH

Decreased quality of life

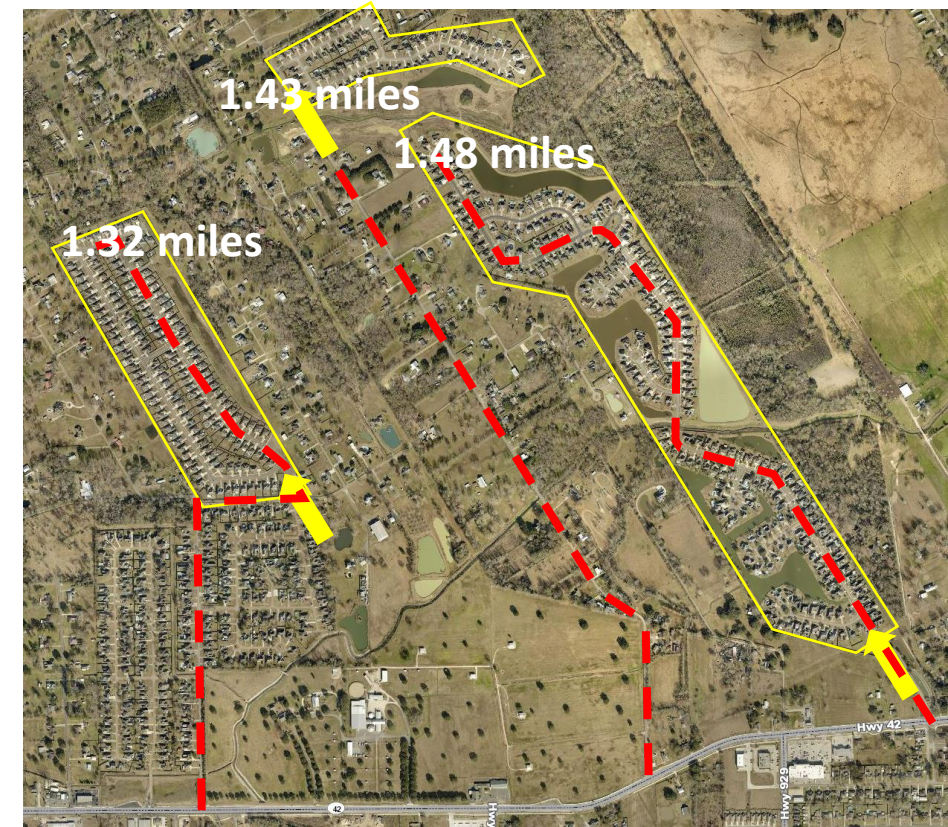
- Traffic issues
- Drainage issues

Parish budget impacts

Politically unpopular

Growth Management Recap

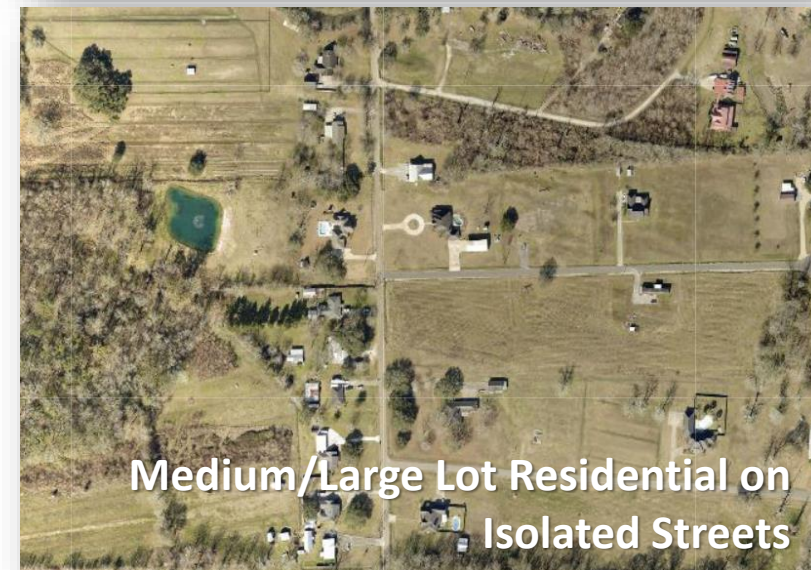
- The Parish has experienced a lot of growth over the last decade (18%)
- The pattern of recent growth has included disconnected residential developments that have not taken advantage of the Parish's natural assets
- Capital Regional Planning Commission estimates 52,000 people / 22,500 housing units by 2042
- Limited available land to accommodate growth if excluding municipalities, agriculture, open space, wetlands, and flood hazard areas
- Strengthening standards in those areas is crucial to the Parish's future



Growth Management Recap

What are the benefits of Growth Management?

- The Parish has an available holding capacity, managing within that capacity is essential
- Less far-flung infrastructure means less expense by Parish to maintain
- Rural and natural resources preservation - focused areas of development (Neighborhood Hubs) means better preservation of natural & rural areas
- Development that is sensitive to natural features helps mitigate flood risk



Growth Management Recap

How can the ULDC Manage Growth?

- Requiring or encouraging mixed-use
- Setting the intensity of new developments with open space requirements or incentives
- Establishing lot sizes that discourage sprawl
- Setting decision criteria for rezonings and other development applications
- Requiring adequate public facilities be in place for future growth areas
- Preserving natural and rural areas



ULDC Critique and Recommendations

Rework Zoning Districts

Recommendation: Rework residential zoning districts for more permanent open space with density bonus in return.

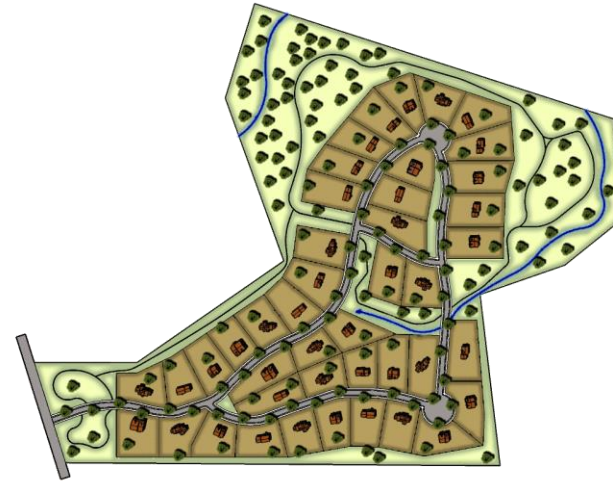
- Retain 3 current Rural, Conservation, and Residential Medium district standards as 3 development options within the RM district
- Add Countryside, Rural, and Estate districts
- Conventional, Cluster, Conservation, and Mixed/Infill



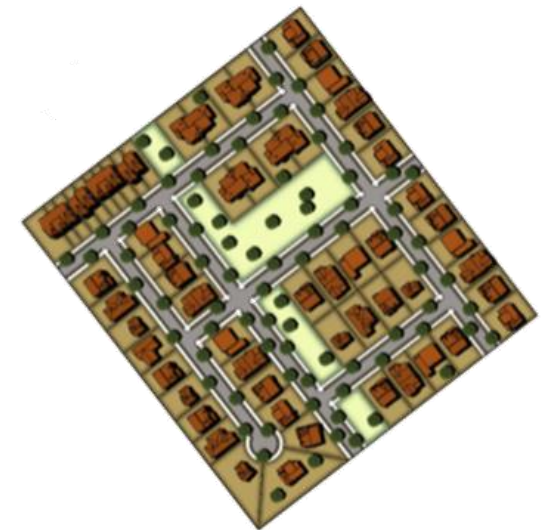
Conventional



Cluster



Conservation



Mixed/Infill

Rework Zoning Districts

Land Use Plan Designations	Current District	Proposed Zoning Districts	Development Options	Waste water	Min. Lot Area	% Open Space ¹	Max. Density ²	% Bonus ³
Rural Residential / Open Space	<i>New</i>	Countryside	Conventional	Private	20 acres	0%	0.05	N/A
	<i>New</i>		Conservation	Private	18,000 SF	95%	0.1	50%
	<i>New</i>	RR, Rural Residential	Conventional	Private	5 acres	0%	0.2	N/A
	<i>New</i>		Cluster	Private	2 acres	40%	0.3	50%
Estate Subdivision	Conservation	RE, Estate Residential	Conventional	Private	1 acre	0%	1.0	N/A
	Rural		Cluster	Community	19,000 SF	35%	1.4	40%
	<i>New</i>		Conservation ⁵	Public	7,000 SF	70%	1.6	60%
Residential Neighborhood	Medium Res.	RM, Medium Residential	Conventional	Community	14,520 SF	0%	2.8	N/A
	<i>New</i>		Cluster ⁴	Public	6,500 SF	25%	4.5	60%
	<i>New</i>		Conservation ⁵	Public	4,500 SF	35%	5.5	96%
	<i>New</i>		Mixed / Infill ⁶	Public	2,500 - 4,000 SF	20% - 40%	7.0 – 9.5	150% - 240%

1. Common open space in entire development

2. Dwelling Units per Acre

3. Compared to conventional

4. Cluster allows single-family and townhouse

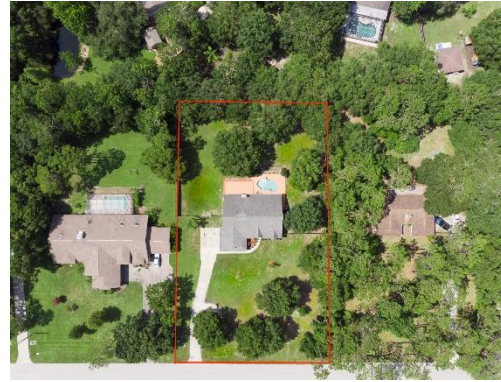
5. Conservation allows single-family, duplex, and townhouse

6. Mixed/Infill allows single-family, duplex, townhouse, and triplex

Visualizing Density



20 acre



1 acre



5 acre



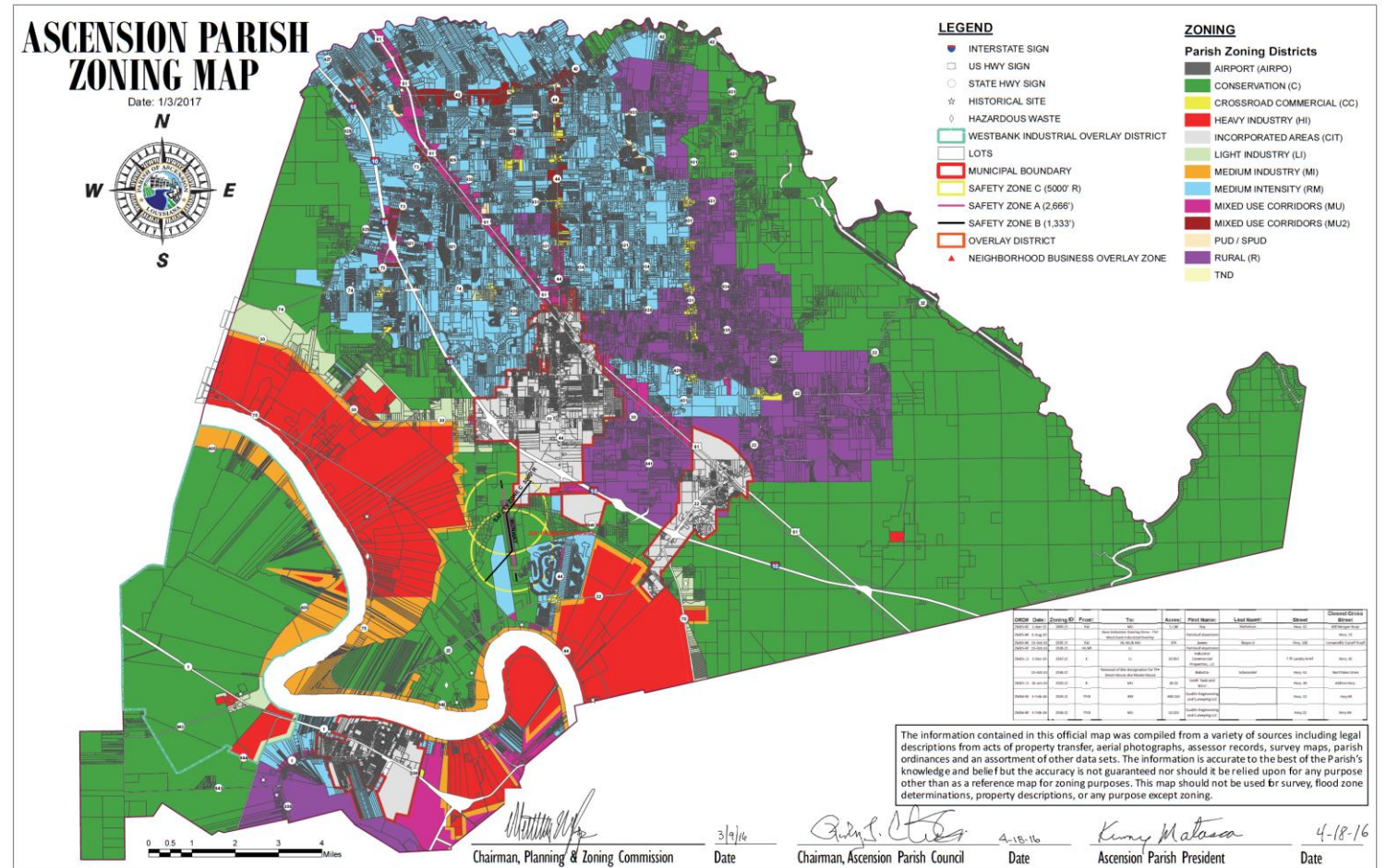
14,000 square feet



2,500 square feet

Rework Zoning Districts

Wherever the proposed Countryside district is applied in the **green area** would effectively prevent all but the least dense development



Rework Zoning Districts

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4. Cluster allows single-family and townhouse

5. Conservation allows single-family, duplex, and townhouse

6. Mixed/Infill allows single-family, duplex, townhouse, and triplex

Rework Zoning Districts

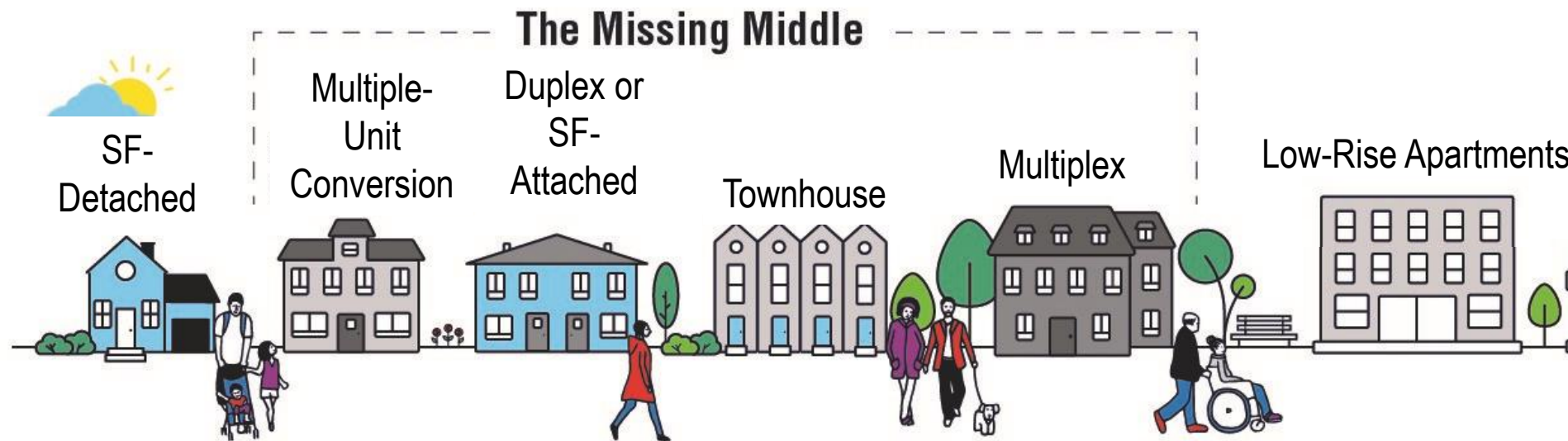
Potential ULDC Amendments:

- Modify Table A: Permitted Uses by District to show which uses are allowed in the various development options
- Overhaul Table B: Site Requirements by District related to maximum densities, minimum open space, and permitted housing types
- Ensure each district purpose statement clearly relates to the intended goals within that district
- Reconcile Park / Open Space Requirements Sections in Subdivision and PUD/SPUD provisions
- Provide illustrations to show development types

Encourage Additional Housing Types

Recommendation: Encourage housing types that allow more compact development but not at the expense of existing character.

- Allow diversity of housing types in Cluster, Conservation, and Mixed/Infill development types
- Provide design standards for housing types to minimize impact and possible community pushback



Encourage Additional Housing Types

Sample from Zachary, Louisiana

Figure 2.303
Patio House

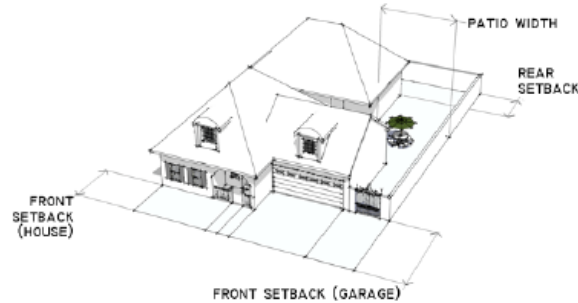


Table 2.303
Patio House Lot and Building Standards

Development Type	Patio House		
Lot Area Group	Small	Average	Large
Pct. In Group	25	50	remainder ¹
Min. Site Area per Group (sf.)	25,000		
Min. Lot Area per du (sf.)	4,640	5,000	5,450
Min. Lot Width per du (ft.)	50	55	60
Min. Front Setback (House / Garage ²) (ft.)	12 / 20		
Min. Building Separation (ft.)	10		
Min. Patio Area ³ (sf.)	930 / 48	1,000 / 48	1,000 / 48
Min. Patio Width (ft.)	20	20	22
Rear Setback (House / Garage ⁴) (ft.)	10		
Max. Height (ft.)	28		
Max. Building Coverage Ratio	50%	48%	48%

TABLE NOTES:

¹ See Section 2.203, *Residential Lot Averaging and Distribution of Averaged Lots*, subsection C.

² Setback from right-of-way to garage front when the garage faces the street instead of an alley.

³ The patio area is a rectangle having minimum area and width that is a basic yard, but does not count all the yard area. This ensures a useable principal outdoor space.

⁴ Setback from rear lot line to garage when the garage is accessed from an alley.

Figure 2.307A
Multiplex



Figure 2.307B
Multifamily

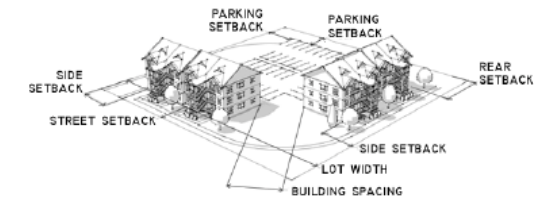


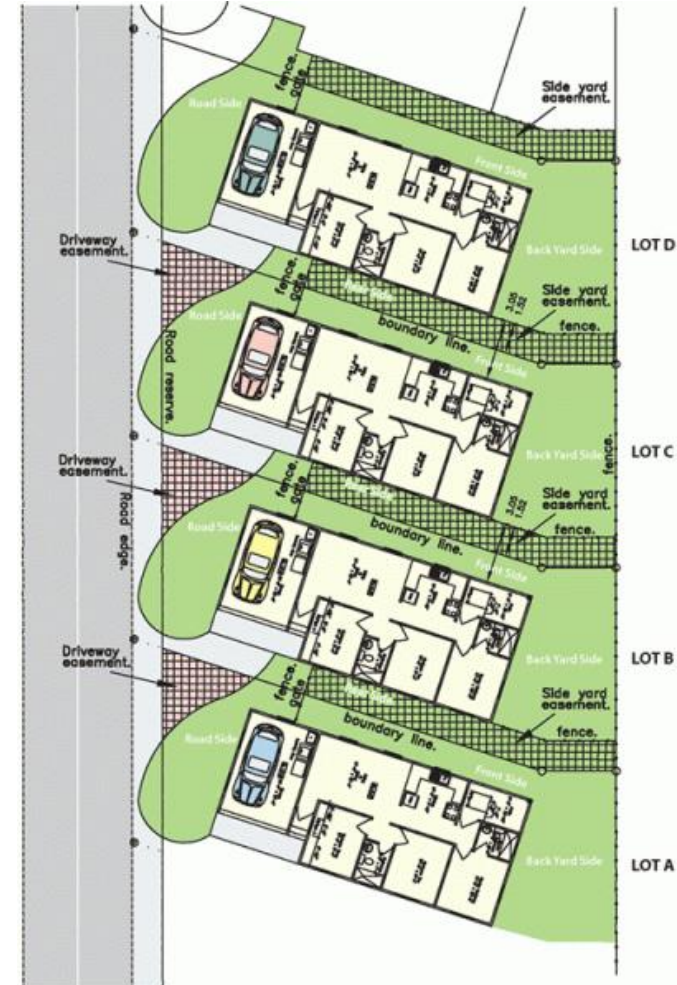
Table 2.307
Multiplex and Multi-Family Lot and Building Standards

Development Type	Multiplex	Multi-family
Min. Site Area per Building (sf.)	8,000	15,000
Min. Lot Area per du (sf.)	2,000	1,800
Min. Lot Width per Building (ft.)	80	100 ¹
Min. Street Setback ² (ft.)	20	30
Min. Rear Setback (ft.)	15	30
Min. Building Separation (ft.)	15	30
Parking Setback from Street Curb (ft.)	20	parking not permitted in street yard
Parking Setback from Rear and Side Lot Lines (ft.)	2.5	8
Max. Height (ft.)	35	50

Encourage Additional Housing Types

Potential ULDC Amendments:

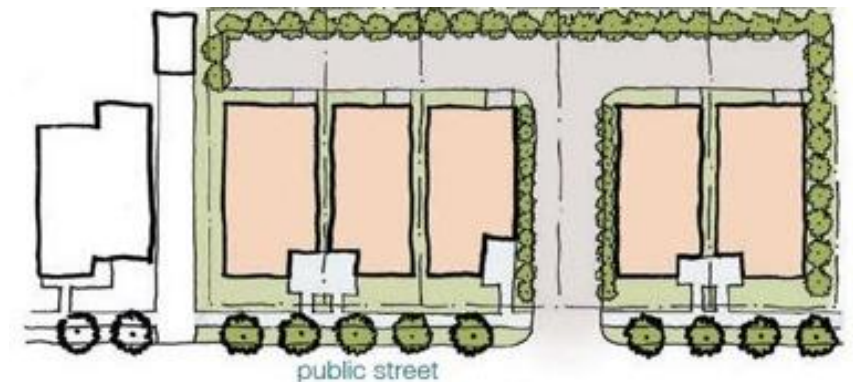
- Modify Table A: Permitted Uses by District to reflect permitted housing types allowed in the various development options
- Overhaul Table B: Site Requirements by District related to minimum and maximum setbacks, building heights, and permitted housing types
- Modify both tables to account for alternative housing types such as zero lot line, patio home, and multiplex
- Combine townhouse provisions from Subdivision Regulations with other housing types into a consolidated ULDC
- Provide illustrations to show housing types



Incentivize Infill Development

- Infill is “the use or reuse of vacant lots in areas that have already been developed”
- Makes more efficient use of existing infrastructure
- Curbs sprawling development into the periphery of already urbanized or urbanizing areas in the Parish
- Can result in a bonus for the developer in terms of density, intensity, housing types, or nonresidential uses
- Require infill to respect context and surrounding character

Recommendation: Incorporate provisions that incentivize infill development.



Incentivize Infill Development

Potential ULDC Amendments:

- Modify Table A: Permitted Uses by District to potentially allow additional uses for infill development than typically allowed
- Overhaul Table B: Site Requirements by District related to provide an infill development type (along with conventional, cluster, conservation, and planned)
- Adjust bufferyard requirements specific to infill
- Consider adjusting parking requirements for constrained sites
- Allow additional density or uses where consecutive lots are assembled

Consider Adequate Public Facilities

- Ensure that growth only occurs where adequate wastewater and roads exist or *will soon* exist
- Parish must have adopted levels of service for facilities for which it wants to require adequacy (Already has LOS of D for Roads; no LOS for sewer)
- If the road or wastewater line would be unable to maintain the adopted level of service, then the proposed development cannot take place unless developer pays for the upgrade
- Encourages connected rather than leapfrog development

Recommendation: Incorporate adequate public facilities requirements so that the timing of growth takes place in a controlled, rational manner that is fiscally sustainable.

Master Plan Recommendations

- Direct new development toward areas where there are adequate roads to accommodate growth, and scale new streets to fit their surroundings to promote safety and attractiveness.
- Coordinate with the school district on the location of schools in areas with adequate transportation infrastructure.

Consider Adequate Public Facilities

Sample from Calcasieu Parish Code

- Applies to water, wastewater, drainage, fire protection, and roads
- Applicant must provide documented, verifiable evidence that the subject property can be served by adequate public facilities and services prior to occupancy and use of the proposed development at adopted level-of-service standards

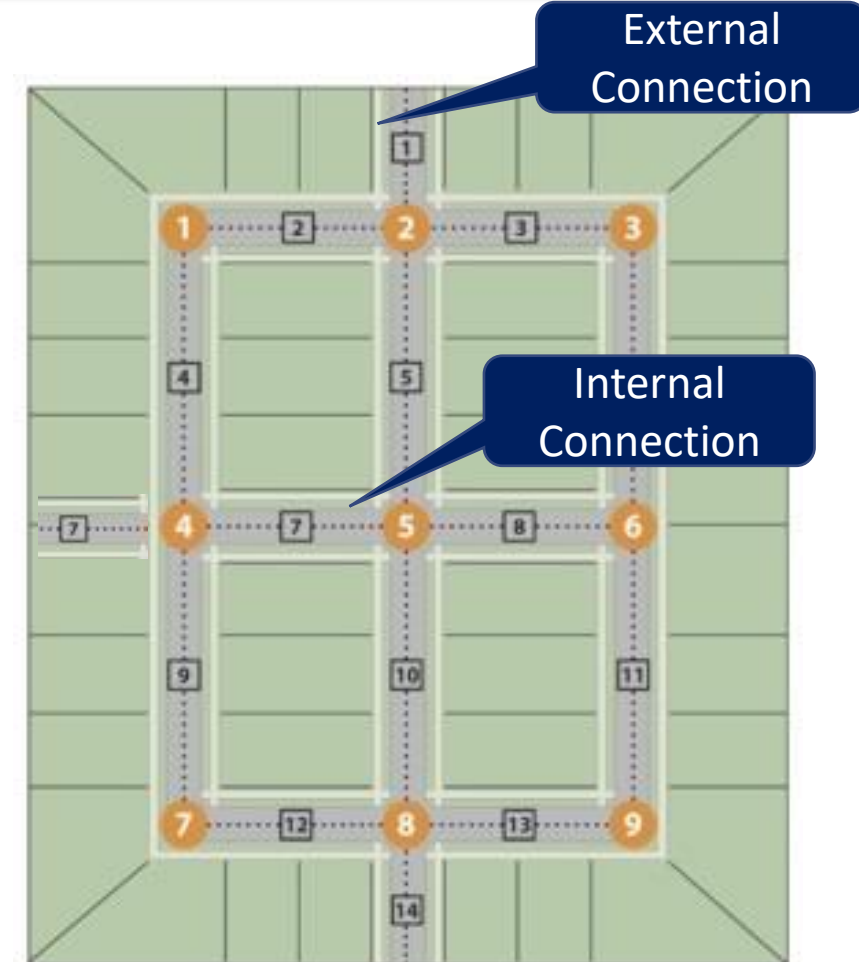
Potential ULDC Amendments:

- Adopt Level-of-Service for sewer as a Parish policy
- Modify subdivision regulations to include adequate public facility provisions

Require Street Connectivity

- Internal connectivity requires connected new local and collector streets within a subdivision
- External connectivity requires that the subdivision connect to existing streets outside its boundaries
- Helps to ensure that new subdivisions are developed in closer proximity to one another and prevents “bottlenecks” during high traffic periods
- Introduce a connectivity index (ratio of links to nodes)

Recommendation: Adopt street connectivity standards for new developments.



Require Street Connectivity

Sample from Lafayette City-Parish Code

- Connectivity ratio of 1.0 to 1.6 depending on district
- Does not apply to conservation development types

Potential ULDC Amendments:

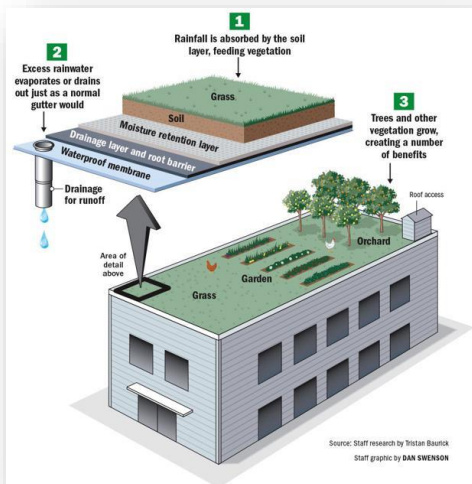
- Modify Subdivision standards to incorporate the connectivity ratio based on zoning district and/or development type

Encourage Low-Impact Development

- **Low-Impact Development** integrates natural systems and practices that use or mimic natural processes that result in the retention, infiltration, evaporation, or use of stormwater to protect water quality and manage water.
- Relates to growth management by providing a natural way to ease the burden on expensive water treatment facilities

Recommendation: Incorporate Low-Impact Development provisions to minimize runoff and associated pollution by natural means, close to where it is generated.

Green Roof



Bioswale



Cistern



Encourage Low-Impact Development

Example from Jefferson Parish

- An applicant for site plan review **may** use LID best management practices (BMPs) to meet stormwater management, landscaping, buffering, screening, and tree preservation requirements
- LIDs must have capacity to retain and filter the first 1 ¼" of rainfall
- Incentives
 - Decrease minimum setback to accommodate LID features
 - Increase maximum gross floor area
 - Reduce required parking by 25%
 - Waive landscaping requirements in order to accommodate LID features



Encourage Low-Impact Development

Potential ULDC Amendments:

- Incorporate LID principles into landscaping and bufferyard standards and drainage requirements
- Allow (or incentivize) use of pervious pavement in parking areas to minimize runoff volume
- Allow green roofs as open space in TND standards, and in remainder of ULDC
- Allow storage and re-use of stormwater or partially treated “production water” for irrigation purposes
- Consider “menu of options” approach

Other Recc's to Manage Stormwater and Sewer

- **Coordinate ULDC standards with drainage requirements and design criteria**
- **Establish fill requirements**
- **Coordinate regional detention areas**
 - Consolidate detention facilities for efficiency
- **Establish stormwater management areas**
 - E.g., 20% or more of a major subdivision must be set aside for natural treatment of stormwater
- **Create incentives to improve sewer, manage traffic and flood zones, and address school capacity issues**
- **Property tax millage to buy property for stormwater facilities, recreation, and other public lands**



Other Recommendations

Organization and Structure

Q: How should the updated ULDC be organized?

A: In the manner in which the code is most often used:

- What is my property zoned?
- What uses are permitted?
- Where and how much can I build?
- What building or site design standards are required?
- What are the steps in the process?
- From whom do I receive approval?
- How are things measured or defined?

Casual Users

```
graph LR; CU[Casual Users] --> Q1[What is my property zoned?]; CU --> Q2[What uses are permitted?]; CU --> Q3[Where and how much can I build?]; TU[Technical Users] --> Q4[What building or site design standards are required?]; TU --> Q5[What are the steps in the process?]; TU --> Q6[From whom do I receive approval?]; TU --> Q7[How are things measured or defined?];
```

Technical
Users

Recommendation: Organize development regulations in an intuitive order in the form of a Unified Code.

Organization and Structure

EXISTING STRCUTRE

Appendix I - Zoning Tables

II- Development Code

III - Master Plan And Land Use Plan

IV - Subdivision Regulations

V - Drainage

VI – PUD Code

VII – TND Code

VIII - Mobile Home Park Regulations

IX - Recreation Vehicle Park Regulations

X - Fire Hydrant Code

XII - Fees

XIII - Major Street Plan

XIV - Subdivision Construction Specifications

A BETTER STRUCTURE

Chapter 1. General Provisions

2. Zoning Districts and Dimensional Standards

3. Use Standards

4. Building and Site Design Standards

5. Subdivisions and Public Improvements

6. Open Space and Environmental Management

7. Development Review Bodies

8. Development Review Procedures

9. Nonconformities

10. Word Usage & Definitions

User-Friendliness

code / APPENDIX I - ZONING TABLE

SHOW CHANGES

Single-family residential	Y ²	Y ²	Y ²		Y ²	Y ²	Y ²	Y ^{1,2}	Y ^{1,2}		
Town houses	Y										
Multi-family residential, apartments	Y		Y								
Mobile home parks				Y							
Mobile home subdivisions				Y							
RV Park				Y							
Recreational and Institutional Uses											
Airports											Y
Camps					Y	Y					

?

Recommendation: Clearly articulate all requirements without ambiguity and subjectivity and provide clear illustrations, graphics, and tables.

User Friendly Enhancements

- Integrate Tables A and B directly into the Code
- Maintain a deliberate and consistent hierarchy & numbering system
- Use fonts, styles, and tabs to establish visual hierarchy
- Keep similar provisions together
- Clearly assign duties (“The Planning Director shall...” instead of “The Parish shall...”)
- Turn guidelines or policies into standards, or remove from the ULDC

UNIFIED DEVELOPMENT ORDINANCE

TITLE XV: LAND USAGE (Harrisburg Unified Development Ordinance (UDO)) > Chapter 141: Building and Site Design > § 141.02 Building Design > 141.02.04 Nonresidential and Mixed Use

4. Varied rooflines and parapet heights;

5. Changes in materials;

6. Corner elements;

7. Juliet balconies; or

8. Other features that the Director approves.

b. The false second story is not required to be under-roof or habitable but the facade shall extend a minimum of eight feet above a typical first story to allow the addition of elements described in 4.a above and create the appearance of a second story. Buildings with three tenants or more may include single-story segments for a maximum of 30 percent of the facade to create diversity in the building height. A specific minimum building height is not required.

Figure 141.02.04-2, False Second Story

FIGURE NOTES:
A = Windows in Mid-section of Facade | B = Clerestory Windows | C = Shading Devices | D = Varied Rooflines and Parapet Heights | E = Change in Materials

Clarity and Accuracy

Conflicts, Duplications, and Inconsistencies

- 17-2017, Light industrial (LI), lists procedural and design standards while other purpose statements (correctly) do not
- 17-2043-B, Standards for Small Wireless Facilities in the Rights-of-Way in the Parish of Ascension Parish Government, has its own set of definitions – consolidate all definitions
- Duplicate or conflicting definitions for: abutting, access, accessory use, acre, alley, antenna, appeal, applicant (And that's just the "A"s!)
- Some provisions in Subdivision Regulations seem out of place: Townhouse lot areas and widths, tree requirements that aren't part of ROW, etc.

Streamlining and Modernization

- **Procedural Streamlining**
 - Allow administrative approval when appropriate, as Council sees fit
 - Staff can administer the ULDC, if standards are clearly articulated
- **Reduce Reliance on PUD/SPUDs**
 - Uncertain outcomes for applicant and neighbors
 - Time is money
 - Integrate common PUD/SPUD standards into ULDC to allow them “by-right”
- **Legal Issues**
 - Reed v. Gilbert – Signs cannot be regulated by the content or purpose (e.g., “commercial signs”)
 - Statutory amendments as necessary
- Integrate good ideas from **Overlay Districts** for use in other areas as appropriate
- Publish an **interactive, user-friendly**, online code level-up customer service
- **Integrate and cross-reference** applicable development provisions in Parish Code

How do we get there?

Phase 2 - implementation

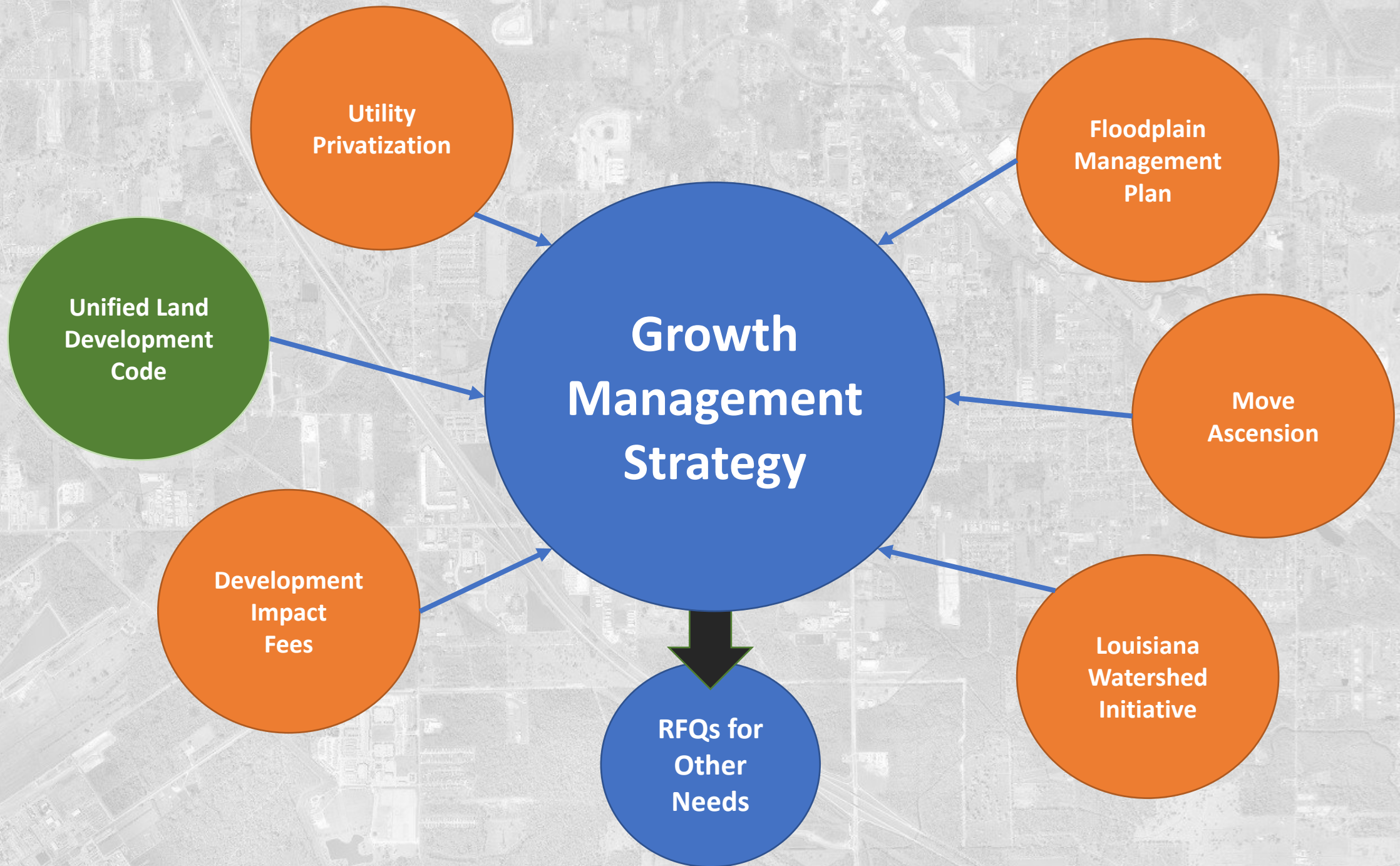
ULDC update project

What it is...

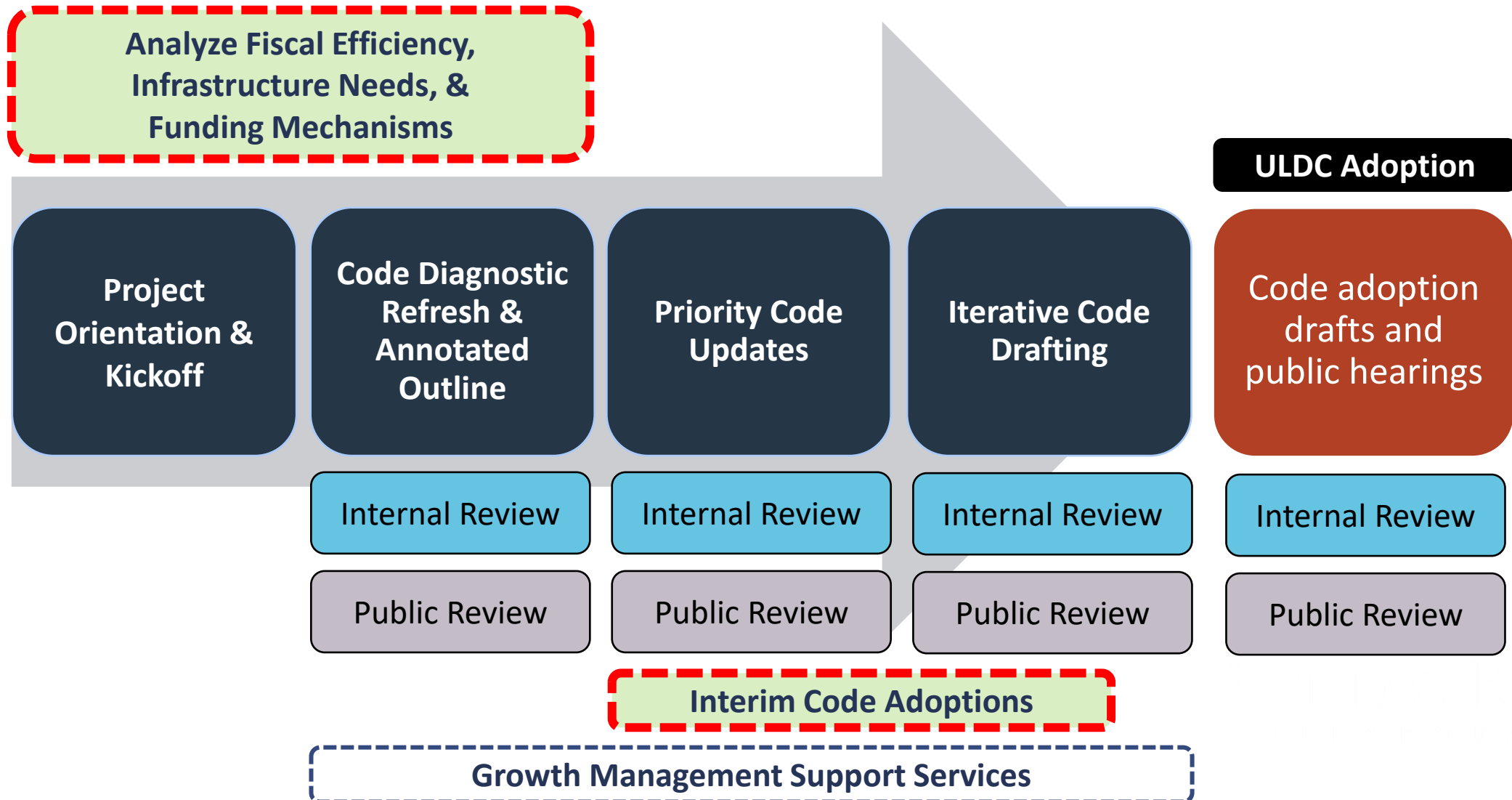
- Targeted ordinance amendments to implement Parish growth and infrastructure policies
- Standards for maintaining the Parish quality of life
- Standards for preserving rural character
- Ordinance for dividing land and reworking zoning districts
- Procedures for development approvals

What it is NOT...

- A Master Land Use Plan update
- A Parish-wide remapping process
- Engineering or technical design standards
- Building code
- Specific development plan for a project



Phase 2 – Proposed Scope of Work



Public Engagement Process

- Code Advisory Committee (CAC)
- Technical Advisory Committee (TAC)
- Stakeholder Interviews
- Reception and Briefings for Parish Council, P&Z, BOA
- Community Surveys
- Community Meetings
- Interactive Project Website



Infrastructure Analysis

Five-part analysis

- Initiation and acquire and review data
- Prepare fiscal efficiency of land uses for the Parish
- Analyze existing Parish infrastructure funding programs
- Evaluate Parish Capital Improvement needs and identify appropriate funding mechanisms
- Evaluate and recommend infrastructure funding options

Carson Bise II, AICP
Infrastructure & Fiscal Analysis

TischlerBise
FISCAL | ECONOMIC | PLANNING



Further informs
ULDC updates

**Responsible
Growth**

The Drafting Process

- We draft in the cloud! (enCodePlus)
- We draft in iterations (contents TBD)
 - Module 1 → review and comment
 - Module 2 → review and comment
 - Consolidated draft → review and comment
 - Code adoption

Final ULDC published online on a user-friendly platform that is easy to maintain

The screenshot displays the enCodePlus web-based drafting environment. The main window shows a document titled "Section 10-4-2.1 NB Districts and Uses". The document content includes a list of districts and their purposes. On the right side, there is a "Comments" sidebar. It lists three comments with their respective authors, dates, and status (Hidden, Followup, or Completed). Each comment has buttons for "Edit", "Reply", "Followup", and "Completed".

Section 10-4-2.1 NB Districts and Uses

A. Districts.

1. **Plan Implementation.** The zoning districts that implement the Estate Residential, Suburban Residential Attached and Multi-Family, Auto-Oriented Residential, Residential Mix, and Mixed Character Core designations on the Future Land Use and Character Map include:
 - a. ACR, Acreage Residential;
 - b. LLR, Large Lot Residential;
 - c. MLR, Medium Lot Residential;
 - d. SLR, Small Lot Residential; and
 - e. MFR, Multi-Family Residential.
2. **Purposes.** The purposes of these districts and their relationships to the Comprehensive Plan and former zoning designations are set out in Section 10-1-1.1, *Base Districts*.

B. Land Uses. The land uses are organized by general and specific use categories. As set out in Table 10-1-1.3, *Land Use Matrix*, a land use is indicated as being **Permitted (P)**, permitted subject to special Standards (S), permitted subject to approval of the Conditional Use (C), **Accessory (A)**, or **Prohibited (-)**. If additional standards apply to land uses, the applicable sections are cross-referenced in the far right column of the table.

----- End of Section -----

Comments

Comment Text	Id
needs updated link	2998
	By: WebMaster Date: 08/20/2021 9:28:42 AM
	<input type="checkbox"/> Hidden
	<input checked="" type="checkbox"/> Followup
	<input type="checkbox"/> Completed
edit	
reply	
followup	
completed	
Simplify this all. something along the line of the districts are closely tied to the Future land use map	972
	By: Jennifer Henninger Date: 04/16/2021 1:08:43 PM
	<input type="checkbox"/> Hidden
	<input type="checkbox"/> Followup
	<input type="checkbox"/> Completed
edit	
reply	
followup	
completed	
Recommend deleting all discussion of land-uses.	845
	By: Elizabeth Kay Marchetti Date: 04/07/2021 11:32:55 AM
	<input type="checkbox"/> Hidden
	<input type="checkbox"/> Followup
	<input type="checkbox"/> Completed
edit	
reply	
followup	
completed	

The screenshot shows the Littleton Unified Land Use Code (ULDC) website. The header includes navigation links: HOME, ABOUT, PROPOSED ULUC, PARTICIPATE, ACCOMPLISHMENTS, RESOURCES, SEARCH, and QUICK REFERENCES. The main content area is titled "UNIFIED LAND USE CODE" and features a "Table of Contents" on the left. The table of contents lists various chapters and articles, including "ARTICLE 10-3-3 CMU DESIGN". The right side of the page displays a large image of a building complex, likely a school or community center, with a caption "Figure 10-3-3.2A.1 Build-To Frontage". Below the image, there is a list of items, including "2. Drive-Through Frontage".

Littleton HOME ABOUT PROPOSED ULUC PARTICIPATE ACCOMPLISHMENTS RESOURCES SEARCH QUICK REFERENCES

Unified Land Use Code

Table of Contents

- Title 10 – Unified Land Use Code (ULUC)
- CHAPTER 1 STANDARDS FOR ALL DISTRICTS
- CHAPTER 2 DOWNTOWN (DT)
- CHAPTER 3 CORRIDORS AND MIXED-USE (CMU)
- ARTICLE 10-3-1 CMU PURPOSE AND APPLICABILITY
- ARTICLE 10-3-2 CMU CORRIDOR MIXED-USE DISTRICT
- **ARTICLE 10-3-3 CMU DESIGN**
- Section 10-3-3.1 CMU Building Materials
- Section 10-3-3.2 CMU Standards of Design
- ARTICLE 10-3-4 CMU GREENSCAPE
- ARTICLE 10-3-5 CMU SIGNS
- CHAPTER 4 NEIGHBORHOOD (NB)
- CHAPTER 5 BUSINESS AND INDUSTRY (BI)
- CHAPTER 6 SUBDIVISION STANDARDS
- CHAPTER 7 ENVIRONMENTAL MANAGEMENT
- CHAPTER 8 HISTORIC PRESERVATION
- CHAPTER 9 ADMINISTRATION
- CHAPTER 10 NONCONFORMITIES
- CHAPTER 11 ENFORCEMENT, VIOLATIONS, AND REMEDY
- CHAPTER 12 WORD USAGE
- APPENDICES

UNIFIED LAND USE CODE

Title 10 – Unified Land Use Code (ULUC) > CHAPTER 3 CORRIDORS AND MIXED-USE (CMU) > ARTICLE 10-3-3 CMU DESIGN

1. **Build-To Frontage.** A building or structure shall be constructed so that its front facade is generally aligned with one another relative to the street.
2. **When buildings within 300' in either direction of the subject lot along a block face are established along a build-to line or are generally aligned with one another relative to the street, or**
3. **When development is proposed on a lot at an intersection of commercial corridors where buildings, existing or proposed to be constructed, located on any of the adjacent corners are built to the street.**

Figure 10-3-3.2A.1 Build-To Frontage

2. Drive-Through Frontage.

- a. **Context.** A drive-through lane as illustrated in Figure 10-3-3.2A.2, *Drive-Through Frontage*, may be located on a lot provided compliance with the standards set out in Subsection 10-3-3.2.B, *CMU Building and Site Design*.

Considerations when adopting new tools

- **Build where infrastructure allows** – don't build where it doesn't
- **Build where nature allows** – don't build where it doesn't
- Mandates, incentives, or a mix?
- Will the tool result in **context-sensitive growth** within urbanized/suburban/rural areas?
- **Prioritize tools** – near- and long-term (and VERY NEAR – before moratorium expires)
- Administration and enforcement – tools are effective if **consistently applied**

THANK YOU!

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