

REGULATORY CONFORMANCE REPORT

OCTOBER 2019

OVERVIEW

This report is one of two documents assessing the existing frameworks for which development in Indianapolis is guided to support transit-oriented development. The Policy Evaluation Report focuses on adopted policies related to TOD, while the Regulatory Conformance Report assesses current development regulations in relation to TOD.

The Regulatory Conformance Report is a preliminary analysis of the current Indianapolis-Marion County Consolidated Zoning and Subdivision Control Ordinance. It compares the adopted regulations to the policies defined in the TOD Design Guidelines (developed 2019), the Regional TOD Strategic Plan (2015), and the adopted Blue Line Transit Oriented Development Strategic Plan (adopted 2018). The purpose of this report is to evaluate how well the current regulations align with local transit-oriented development (TOD) policies and practices.

This report is a preliminary step in the process. It is a critical view of the current regulations and intended to start a dialogue about any number of potential strategies to refine the City's land use and development regulations and review processes. None of the commentary or analysis in this report represents an official direction of the project or a formal recommendation. Rather, it is focused on key transit-supportive policies and many other topical issues that will be discussed by area stakeholders and City staff throughout this process.



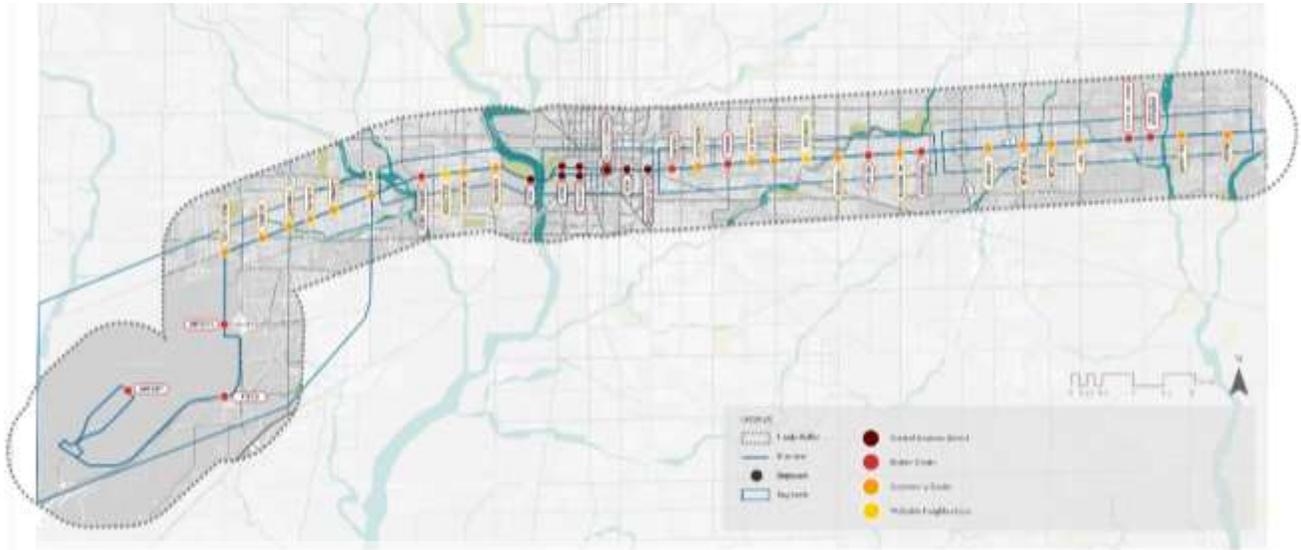
TOD POLICIES & REGULATIONS

Indianapolis has developed three primary plans to guide transit-oriented development projects along the Blue Line BRT route – the TOD Design Guidelines (2019), the Regional TOD Strategic Plan (2015), and the adopted Blue Line Transit Oriented Development Strategic Plan (2018). The objective of these plans is to guide future growth and development in a way that is supportive of public investment in the transit system.

A plan serves as a policy framework for managing future change in a community in pursuit of its vision. A plan lacks the regulatory authority and often the specificity of zoning and its ability to control

development through a variety of design standards. Therefore, development regulations must provide the City/County with the tools necessary to manage change, enable different development options, and react to circumstances that cannot be fully anticipated.

Indy Rezone was an exhaustive process that engaged the broader Indianapolis community, it was responsible providing zoning to the entire community, all 400+ square miles. Indy Rezone was a much-needed process to provide the community with a modern zoning ordinance to guide development. Transit-oriented development was not a focus of the Indy Rezone process. This report is an assessment of how effective the City's existing



Blue Line – Adopted Place Typologies

land use and development regulations are at implementing the transit-oriented development based on the recent policies and strategies that have been created through the various plans of the City.

TOD DESIGN GUIDELINES & BLUE LINE TRANSIT ORIENTED DEVELOPMENT STRATEGIC PLAN

The Blue Line Strategic Plan identifies the following place types for Indianapolis TOD station stops. The following place types define the general characteristics of development that is necessary to support the bus rapid transit system –

- **Central Business District**, defined by:
 - Employment & Residential Density
 - Large-Scale Development
 - Heightened Public Realm Design
- **District Center**, defined by:
 - Cultural Districts
 - Well-Connected to Neighborhoods
 - Mixed-Use, Medium-Scale Development
 - Active & Safe Streets
- **Community Commercial**, defined by:
 - Civic & Residential Mix
 - Residential Density at Core
 - Walkable Neighborhoods
 - Comfortable Pedestrian Experience
- **Walkable Neighborhood**, defined by:

- Moderate Housing Density
- Small-Scale Development
- Walkable Blocks
- Lower Intensity Commercial Uses

This report uses the place types and characteristics to analyze the City's current regulations for alignment with the City's TOD policies.



The characteristics that distinguish the different place types include the following: Public Space, Urban Form, Mix of Uses, and Housing Diversity.

- **Public Space** – the design of public space, particularly the roadway and rights-of-way, that support human-scaled development, transportation, and the needs of people, including wider sidewalks, safe crosswalks, and narrow vehicle lanes. Additional themes outlined in the TOD policy documents include:
 - Quality Public Space & Pedestrian Infrastructure
 - Safe & Frequent Intersections
 - Integrated Mobility Systems & Expansion of Options
- **Urban Form** – defines how a district – comprised of streets, blocks, and lots – should be arranged based on the context. Policies promote smaller, shorter walkable blocks and alleyways to increase connectivity and frame the development patterns. Additional urban form themes outlined in the TOD policy documents include:
 - Mitigated Physical Barriers, Walkable Blocks, Accessibility
 - Pedestrian-Oriented Development – human-scale, fine grained, diverse
- **Mix of Uses** – the variation and intensity of uses in a district-wide context. The variation and intensity are greater in the Central Business District place type, and more moderate in a Walkable Neighborhood context. Additional land use themes outlined in the TOD policy documents include:
 - Nodal Development Patterns with Diverse Use Mix
 - Employment Density
 - Strategic Economic Development
 - Leveraged Proximity to Existing Hubs (Major Trip Generators)
- **Housing Diversity** – represents the variety of housing that would be appropriate in different place types to support the area around a transit station. Housing types identified for the Central Business District tend to be mixed-use buildings or apartments, and more moderate types, such as small lot single-family detached houses, accessory dwelling units, and small-scale

multiunit residential buildings, are best for Walkable Neighborhood contexts with a variety of types supporting the other place types. Additional housing themes outlined in the TOD policy documents include:

- Population Density
- Housing Diversity & Adaptability

These categories address the fundamental issues with using the current regulations to implement transit-oriented development. Additionally, this analysis is supported with an in-depth assessment of recognized best practices in transit-oriented development, included in the Transit-oriented Development Case Studies and Best Practices document.



PUBLIC SPACE

following public space principles supportive of transit-oriented development – Connectivity, Streetscape Design, and Open & Civic Spaces.

What the Regulations Say

1. Connectivity. Connectivity standards are good and align with much of the plan guidance and best practices for walkable block sizes and connected transportation networks. They may need to be further refined based on the different scale and types of centers identified in the city/county strategic plans, and a regulatory approach for redevelopment or improved connectivity in areas that do not meet these standards should be explored.

- a. Distinctions among neighborhoods (Districts based on density) is appropriate; higher standard (550' max block) for MU districts is appropriate; and distinction in neighborhoods based on Compact or Metro context areas (550' vs. 950') is appropriate.
- b. The metro context neighborhoods (950' max) may need more stringent standards where walkable neighborhood patterns are appropriate - particularly for the stops, stations, and station area neighborhoods.
- c. A strategy and regulatory approach for improving connections through infill and redevelopment of larger parcels or contexts that currently do not meet the block standards is needed.
- d. Required connections of trails and common area open space systems in subdivisions to the street network can improve the visibility of these spaces and help open spaces shape the structure of more compact and human scale development.

2. Streetscape Design. The regulations lack urban design elements necessary to create a broad range of walkable and multi-modal streets for neighborhoods and activity centers. Without

social value of these spaces, streets unwelcoming to people will continue to be built and it will be difficult to relate development in a meaningful way to the many different types of streets necessary to build compact and diverse places.

- a. The subdivision standards only include right-of-way and pavement widths. The details of how this space is allocated for different components such as travel lanes, bicycle facilities, on-street parking, landscape and street tree amenity, sidewalks, and other social spaces is lacking.
- b. Basing the streets entirely on functional classifications (arterial, collector, or local) instead of street design types that deal with distinctions within those classes, ignores one of the key tools to creating valuable public spaces
- c. Sidewalk standards are inadequate and will not sufficiently support pedestrian movement necessary for promoting transit ridership and associated economic activity generated by improved public spaces. There is not a clear connection between sidewalk standards and streetscapes on a street, block or area basis (subdivision regulations), and sidewalks standards are regulated on a project basis with lot and access standards – and at this later step they are deficient for most high-pedestrian areas. This undermines consideration and improvement of pedestrian system as the crucial start and end of all transit trips. Further the standards (between 4' and 8' minimum) are only the minimally sufficient in the least walkable areas, and entirely inadequate for any neighborhood or activity center that expects pedestrians or to generate economic activity from walkers.

3. Open & Civic Spaces. Open space standards identify different types of spaces ranging from natural and open to formal and compact. However, the criteria for applying different types in specific contexts or for how much open space is required are difficult to interpret. Treating all open space equal (i.e. simply a quantity or a % of lot or project) could have unintended consequences on building form and urban design of compact and well-connected places.

- a. The requirement for common open space systems to connect to public streets through subdivision regulations demonstrates the importance of these spaces and emphasizes the role open space systems have in establishing a structure and context that serves development.
- b. The calculations for different open space standards are complicated. They are abstract formulas that do not relate directly to the types of buildings they support, the types of spaces they are intended to create, or the contexts in which they should be applied.
- c. Determining an open space requirement for a specific project type is difficult due to open space standards in many different places of the code.
- d. Where open space is simply a percentage of the lot or project, it may result in remnant or less desirable unbuilt areas counting to the requirement.
- e. The standards do not value the function and design of the space, but merely the quantity. Projects where small courtyards or plazas are more appropriate may require the same amount of space as projects where buffers or larger open areas are more appropriate.
- f. There is the potential for confusion on what contributes to open space requirements and what the design objective is for different open space requirements – examples include:
 - i. standards for unbuilt areas of a lot intended to limit building scale (% of lot and/or floor area ratio);
 - ii. standards for designed social space (livability space ratio);

- iii. standards for subdivisions to provide a common open space amenity (common open space requirements); and
 - iv. standards to mitigate potential impacts of development with landscape and greens space (various sections throughout the regulations).
- g. The standards seem work at cross-purposes or undermine compact development in some cases – particularly when different standards are layered on a project. Areas of specific concern include:
- i. Additional open space requirements for any residential major subdivision of 20 units or more, and for each additional 30 units. (requirement is unclear and impact on projects is difficult to determine) [741-310];
 - ii. D-5, D-5II and D-8 requiring 60%, 55%, and 55% [742-103.H., I., and M.];
 - iii. Graduated FAR (floor area ration) plus LSR (livability space ratio) in D-8, D-9 and D-10 [742-103.M., N and O.];
 - iv. Lot % requirement (20% and 10% minimum) plus a per unit requirement (55 s.f and 35 s.f minimum) in the MU-3 and MU-4 districts [742-105.D and E.].



URBAN FORM

The regulations were analyzed for the following urban form principles supportive of transit-oriented development – Building Placement and Frontage & Facade Design.

What the Regulations Say

- 1. Building Placement.** The required setbacks for the most transit-supportive districts are generally appropriate to create desired relationships between buildings and streetscapes.
 - a. The “graduated” approach to setbacks – where they get slightly closer the more intense the district is – should be revisited. While it seems logical in an abstract sense, it does not align with how the different scales of walkable places are built and it may be making meaningless distinctions between districts.
 - b. Some of the transitional setbacks seem a bit arbitrary and could lead to some unintended consequences. The code contains limited urban form standards to create a meaningful relationship between development and public space.
 - c. The height limit in the MU-2 district should be revisited. 3-story buildings can be a very appropriate scale for even the smallest, and most neighborhood-oriented mixed-use areas. Both observation of case studies or best practices, and anecdotal evidence from staff’s experience demonstrate that this height should be revisited
 - d. The mixed-use districts include “required front building lines” (the requirement that a certain percentage of the lot should be occupied by building frontage. While this is a good basic concept, the standards lack assurances that these areas will be designed property, and do not note where other approaches to the same objective may be appropriate. The MU-3 and-4 district begins to distinguish this standard based on different frontage types, but that will require a detailed plan to implement,
 - and it still may be susceptible to the same loopholes or unintended consequences without better facade and frontage design standards.
 - e. All of the commercial (C-) districts have lot and building placement standards that will not permit urban patterns and formats. Therefore, they should be used very sparingly in transit-supportive areas (and not on important streets), or these standards should somehow be modified when located in these districts (i.e. by street type or frontage type).
- 2. Frontage & Facade Design.** There are no standards dealing with the design of lot and building frontages in a specific, context-based manner (i.e. the interface between the public space/streetscape and the lot/building). Standards addressing driveway width, landscape parking location and facade designs are scattered in various sections, but often do not amount in a coordinated design approach for this crucial and most prominent design component.
 - a. Standards for building transparency, entrance features, parking location and driveways are based on zoning district, rather than other and more refined context indicators (i.e. use, building type, street type or frontage) these standards are uniform throughout the districts. In some cases, the standards appear to be watered down so they can be generally applicable; in other cases they appear to be too strict for certain situations.
 - b. The MU-3 and MU-4 districts establish a good framework to address this issue by designating different types of frontages. However, this framework needs to be developed further to overcome the following implementation challenges:



- i. It relies on a master plan to designate the frontage types in order to trigger standards.
 - ii. The frontage types do not appear to be coordinated with any particular street type or streetscape design, so an important context element is missing.
 - iii. In the current regulations, the frontages only deal with building placement and required front building lines (form and massing), whereas they could serve as important distinguishers for other degrees of human scale details and frontage design – accounting for the most walkable and least walkable contexts in a center.
- c. None of the other standards on driveway or parking setbacks are geared to different solutions for different contexts, largely because there are streetscape design standards or meaningful distinctions for different street design types to key this off of.

MIX OF USES

The regulations were analyzed for the following mixed-use principles supportive of transit-oriented development – Capacity, Mix & Integration, and Scale & Format.

What the Regulations Say

1. **Capacity, Mix & Integration.** The capacity of development enabled by the zoning districts most relevant to the Blue Line corridor seem to align generally with planning policies. Many districts also enable a range of different uses that can contribute to mix use areas. However, most districts do not have a specific strategy or standards that integrate range of diverse and small-scale uses in a walkable pattern.
 - a. The D-5, D-5II and D-8 zoning districts are most appropriate for providing housing capacity identified in the adopted plans, and the D-9 and D-10 districts can provide some targeted density near station areas. All residential districts are addressed more specifically in the Housing Diversity section below.
 - b. MU-1 district can add some targeted employment or residential density near the corridor, and the allowance for accessory commercial uses adds flexibility for different uses while maintaining limited scale (10% of 5K s.f.). However the development standards can lead to building types and formats that are not easily integrated into walkable development patterns. The allowance for accessory commercial uses in MU-1 adds options and flexibility for different uses while maintaining limited scale (10% of 5K s.f.).
 - c. The applicable scale of the MU-3 district (20 to 50 acres) seems out of scale with well-integrated projects. This amounts to about a 5 to 10 block area in most walkable or transit served areas. In these cases it would be more likely to find a smaller, concentrated area as the activity node (5 to 20 acres or 1 to 5 blocks), and surrounding blocks zoned to compatible and supporting residential districts. In contrast, the applicable scale of the MU-4 district (8 to 25 acres) seems appropriate for a more intense scale mixed-use center.
 - d. The minimum and maximum intensity standards in the MU-4 district contribute to the overall capacity of districts. However, it may be difficult to implement this on a project-by-project basis, and it could lead to unintended consequences. The targets of these standards seem to be best managed on a policy or “intent” of standards basis, or through an area plan, rather than a standard applied to individual projects. As an alternative, shifting the D- and MU-districts to a “building type” approach can better account for the intensity of specific projects.
 - e. The MU-3 and MU-4 districts rely on specific plan designations. While this can help with a more refined implementation of these districts, it will also limit their use to larger-scale master planned projects (unless the city/county proactively implements these districts through area plan engagements). In this case, the standards would be better based on these specific plans than codified generically prior to the plan.



Alternatively adjusting these standards so they can better accommodate small-scale and incremental development and independent projects that ultimately contribute to the overall intensity of the MU-3 and MU-4 districts will be necessary.

- f. The criteria for mixing uses in the MU-3 and MU-4 districts could be impractical to implement and does not account for situations where single-use projects are presenting positive contributions to the mix and integration of uses on a larger scale. For example, the MU-3 and MU-4 requirement that project over 200,00 square feet or footprints of 50,000 square feet have a minimum of 20% and 30% residential component – this does not account for situations where a critical mass of residential is proved by adjacent neighborhoods or other mixed use buildings, and it does not necessarily specify well-integrated residential projects since it is simply based on square footage.
- g. The CBD districts allows a wide range of transit-supportive uses with the capacity and intensity identified in the city/county plans. This is due primarily to a lack of specific use or building scale standards rather than a specific strategy to implement these patterns. These districts are also susceptible to projects and formats that do not implement transit-oriented development patterns as well.
- h. The C-1 and C-3 districts could add some contributing uses to the types of places identified in the strategic plan, particularly if limited in location and application. However, the development standards remain car-oriented (minimum lot size of 1 acre and large setbacks), and they lack limits on scale, lot sizes, and building form that ensure neighborhood-scale uses and

building. (See Form & Format comments regarding C-district standards generally).

- i. The C-4 through C-7 districts are geared towards large-scale commercial uses which are not supportive of transit-oriented development. These districts should be avoided in the Blue Line Corridor.
- 2. Scale & Format** - The districts that allow a mix of uses are not refined by scale for different context. For example, it is just as likely to get two large uses, limiting the diversity of use within a place, as they are to generate twenty small uses, creating a creating a vital concentration of diverse uses and attractions.
- a. Non-contributing uses (large-scale and/or car-oriented formats) are just as likely or more likely that TOD patterns in most districts. Most standards are based on minimums (lot, setback, etc.) that are not aimed at implementing compact, small-scale but high intensity uses and are not targeted to creating specific relationships between buildings, lots, blocks and streets.
 - b. All of the districts have minimum standards for lots, and this may present two problems. First, the 50' minimum frontage could eliminate some of the smallest lot development that creates more authentic, organic, and compact mixed-use centers. Often lots as narrow as 25' are typical in areas that exhibit the best transit-oriented development patterns. Second, there is no *maximum* on the scale of lots and buildings so the standards have a tendency to push to larger scale projects. Large-scale (1/2 block or more) projects often present difficulties integrating into mixed-use districts or walkable blocks. They generally expose more utilitarian sides of



buildings (which are necessary in very large-scale buildings) on important street fronts, rather than internalizing them to side or rear lot lines as occur with smaller-scale and more fine-grained development.

- c. Many of the scale and format standards (required front building line, parking setback, entrances, and transparency) repeat the same standards in each district. Where there are differences, they tend to be subtle and somewhat superficial (i.e. slight adjustment in transparency, or 5' difference in parking setback) rather than an intentional effort to adjust the scale and format of buildings. Further, these distinctions may be better made on a building type, frontage type, or street type basis, rather than on a district-wide basis.
- d. The MU-1 district is susceptible to large towers on large lots, and since there is no maximum lot size or height projects can quickly get out of scale with compact walkable patterns.
- e. MU-2 seems to best promote small-scale mixed-use development, but it still lacks some scale and format standards. The height may be too restrictive based on staff's experience and observations and based on case studies of appropriate building types.
- f. The MU-3 and MU-4 standards tend to push higher intensity projects into larger and larger formats (i.e. ½ or full block buildings), particularly when compounded with other open space or building form standards.
- g. All of the C- districts prioritize large-scale automobile patterns with large minimum lot sizes and building setbacks, with no scale or format limits.
- h. The Use Table begins to break some uses down by intensity. However, these distinctions are still very broad (i.e. retail

light less than 15K s.f. and retail heavy 15K or more). These standards may need to be more refined to the various context and places identified in the strategic plans.

- i. Other "scale" distinguishers for uses are scattered in various sections of the code or are generically applied regardless of use (i.e. ; 10% or 5K limit for accessory commercial in the MU-1 districts; 8K limit in the MU-2 district generally; 50K limit on grocery stores in MU and CBD districts). These standards can get lost and create interpretation issues when they are not part of a targeted and comprehensive approach to different scales of uses. Also, when applied on a district-wide scale to all uses, they can be at once too lenient and too strict. For example, the MU-2 district would be more appropriate with a rich mix of retail and service uses in the 1K to 3K range, while an anchor tenant or small grocery store in the 8K to 20K s.f. range may also be a great contribution to the district. A comprehensive approach scale of uses in the use table could be more effectively integrate all categories of uses with the different place types, development patterns and zoning districts necessary to support transit-oriented development.



The regulations were analyzed for the

c. The secondary dwelling unit option can

HOUSING DIVERSITY

following housing diversity principles supportive of transit-oriented development – Types, Form & Format, and Neighborhood Design.

What the Regulations Say

1. Types (Capacity)... The D-5, D-5II and D-8 zoning districts are most appropriate for providing housing capacity identified in the adopted plans, and the D-9 and D-10 districts have the potential for providing targeted density.

- a. The D-A, D-S and D-1 through D-4 districts are low-density and generally not supportive of transit-oriented development patterns. They should not be used in the Blue Line area except in limited application when adding larger lot options within a broader mix of housing and neighborhoods that still achieve the targeted densities.
- b. The D-6, D-6II and D-7 districts accommodate some density, near the ranges identified in the strategic plans (6-9, 9-12, and 12-15 units/acre respectively). But the development standards (high minimum frontage, low FAR and low LSR) are likely to yield larger scale or suburban format projects, not supportive of transit-oriented development. However, to the extent these districts are not widely used or mapped, they would make good candidates to repurpose to districts with more specific building type standards that will yield those densities in a compact, walkable neighborhood development pattern.

help add some neighborhood-scale diversity. However limiting factors that should be reconsidered are: the district lot and open space standards may be impractical for detached buildings in compact neighborhoods; the requirement that accessory dwelling units be in detached structures in the Compact Context areas; the requirement of an owner/occupant; the requirement for an off-street parking space; and the requirement that the entrance is visible from the right-of-way. All of these requirements will limit the applicability of secondary dwelling units in compact, walkable neighborhoods.

- d. Additional housing options are accommodated by all of the MU districts allowing housing options. However, these opportunities may be limited by impediments identified in the mixed use analysis above. Further, if some of the housing formats and residential districts shift to "building type" standards, many of these types may be appropriate in the MU districts as purely residential projects integrated with a broader mix of uses.

2. Form and Format. The residential development standards are based on district-wide standards for lot size, setbacks and density, and are not tailored to any particular building type. While each district standards may tend to be supportive of a particular housing format, no zoning district anticipates a mix of different housing types and it is difficult to implement walkable

neighborhood patterns under any one district.

- a. All residential districts (D-) use density as its primary metric (minimum lot size and/or dwelling units/acre). Density is an abstract concept that does not account for form, scale, or any relationship between the building and lot or building and streetscape. The density references – where made – should be more specific as to how they are applied. For example, the D-8 district suggests density in the range of “5 to 26 units per gross acre.” This falls within the target range for the primary and secondary areas of the Blue Line Strategic Plans. If it is applied on a neighborhood scale, this is effective guidance. However, if it suggests that a project outside of this range is not appropriate in the D-8 district, it is problematic. For example, a 3- or 4-story apartment building on a 5,000 square foot lot integrates well into most urban or walkable neighborhoods yet can have a project density of 50 to 80 units per acre.
- b. Each district has diagrams and images that imply housing types, but the standards are not necessarily determinant of that outcome, and some of the images appear to conflict with some standards.
- c. The lot-based standards for duplexes (D-5II) simply increase the lot and dimension standards to account for an additional unit, rather than considering an appropriately scaled and designed building divided into multiple units. Suburban-scaled “twin houses” rather than a neighborhood-scaled house divided into two units is the likely result.
- d. The D-8 district seems to be the most permissive to a mix of different building types, and the most supportive of compact, walkable and transit-served areas. However, the open space

standards – including lot percentages, floor area ratio, and livability space ratio for multi-family building types could undermine the most appropriate building types. This is compounded with the lack of specific building type standards and no maximum lot sizes. Therefore the denser the project becomes the larger the likely building and lot scale is, making it difficult to integrate these projects into walkable neighborhoods.

- e. The D-9 and D-10 districts each present a similar opportunity to integrate targeted density in and around mixed-use centers. However, this district also does not have specific building type standards to limit projects from becoming out of scale with walkable neighborhood patterns. The floor area ratio is also working at cross-purposes – it is set low to undermine urban building formats, but it also increases with the building height to undermine the limits the overall capacity on a particular lot.
- f. The open space standards overlap, and it is not clear how multiple standards may apply (lot open space, required open space per units, floor area ratio, and livability space ratio.) Further, some of these could compete against desired building forms and density. (See Civic & Open Spaces comments).

3. Neighborhood Design. The residential districts lack any standards that define the relationship of buildings to the streetscape, or that ensure that a compatible range of many different building types can mix in a compact, walkable neighborhood pattern.

- a. Although entry features are mentioned in many districts, there is a lack of coordinated and explicit design on lot frontages for different residential formats (driveways, garages, landscape, social space and types of entry features that



add interest, diversity and eyes on the street.)

- b. Density controls, bulk standards (setbacks and FAR), and open space are the only tools attempt compatibility. These standards miss the important contributions made by standards addressing scale, form and frontages (i.e. wide diversity within a narrow range of patterns) can make to neighborhood character, thereby allowing a wider range of building types and density to mix compatibly.
- c. There are some design standards located in use-specific standards. However, many can have unintended consequences when dis-jointed from the district or building types. For example, 743-302.E requires off-sets in the facade of attached houses every 2-3 units. While the design objective of this standard is good – differentiate units and break down facades into human scale components – this is a suburban design solution and not very characteristic of some of the best examples of urban row houses which use other design techniques to achieve the same objective.

SUMMARY

The following are observations from the preliminary analysis. These issues provide the foundation for identifying necessary changes will continue to be discussed with staff, stakeholders and public officials to create transit supportive development patterns in Indianapolis and Marion County.

- **Generally** – The regulations do not focus on the patterns, concentration, and uses that ensure transit-oriented development. While some districts and standards could result in transit-oriented patterns, they do not set this as the expectation or requirement. Similarly, while the intent and some of the regulations within a specific zoning district are intended to promote walkable, compact development, often the standards are too general when addressing crucial characteristics or other standards within the same district undo or are contrary to those standards.
- **Public Space** – The Subdivision Regulations and Thoroughfare Plan seem to establish positive rules for creating walkable places. However, sidewalk standards in the development regulations are disjointed from street design and inadequate for achieving transit-oriented development. As a result, there is a lack of coordinated street, block or area scale standards addressing pedestrian networks and circulation
- **Use-based Zoning vs. Urban Design Approach** – The Zoning Ordinance begins to address urban design with standards for building types, building form and frontage types. However, districts still rely heavily on the Use Table and conventional site dimensions, sometimes in ways that conflict with the intent of the regulations.
- **Frontage Design for Commercial Districts** – The development standards to focus generally on many measurable components related to site arrangement. However, there are very few urban design standards related to how a building relates to the public space.
- **Building Types in Residential Districts** – A building type approach (standards keyed to a specific building type, rather than a district) can enable a better mix of compatibly-scaled buildings and lots. The regulations show images and diagrams of typical buildings, but the standards are tied to each zoning district. Therefore, each district has standards set up for one anticipated building type and may not work well for a mix of compatible types. The residential districts that are intended for greater intensity include some competing standards that will impact the scale and form of buildings to the detriment of some desired building types. Additionally, the standards allow buildings that may vary greatly from some of the images and the standards do not set up clear expectations for potential outcomes.
- **Development Standards in Non-residential Districts** – The commercial districts (C- districts all have standards that default to large scale uses and separating uses in patterns that will not support transit (minimum lot sizes and setbacks that imply the larger the better). The MU-2, -3 and -4 districts are most appropriate for walkable and transit-supporting patterns and intensity. However, the standards also assume larger-scale buildings and projects, that inhibit small-scale or incremental projects essential to the most walkable places. The MU district design standards are basic and lack nuances to make meaningful distinctions within mixed use areas, so they may be too lenient for some blocks but too strict on others. The street types in the MU-4 district begin to address this but need a more direct path to implementation and application