



## Memorandum

**To:** Emily Fultz, AICP – City Planner, City of Edwardsville  
**From:** Michael Blue, FAICP – Principal, Teska Associates  
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**Date:** July 14, 2020  
**RE:** **I-55 District Development Code Update: Public Input Findings**

Having completed the initial public engagement portion of the I-55 District Development Code update, this report presents findings of that effort and identifies barriers to successful implementation of the Code. The community input process focused around four main concepts for the District:

- Objectives – “What are the community’s expectations for the I-55 corridor area?”
- Land Use – “What types of development should be part of the I-55 corridor area?”
- Design – “What should development in the I-55 corridor area look like?”
- Process – “How should development of the I-55 corridor be managed by the City?”

The input process included conversations with City Council Members, Plan Commissioners, the ad hoc Zoning Advisory Group, City staff and stakeholders, including the developers and designers who worked on developments in the I-55 District. These conversations confirmed that the original objectives, types of land uses, and expectations for quality of development in the District remain largely unchanged from current District requirements. However, feedback highlighted a number of recent developments in which applying the Code did not effectively resolve conflicts for balancing ordinance requirements with market, site, and design factors facing developers and property owners. The current Code was described as extending the entitlement process, and increases related costs, due to a lack of flexibility that required additional approval tasks. These barriers to sound development are primarily based in the prescriptive nature of the form-based code approach, upon which the I-55 District is established.

Implementation of the current Code has shown it to be overly rigid, even for developments that are permitted and desired in the District. To consider how the Code might be amended to accomplish established objectives in a more user-friendly manner, this report describes how current Code sections can be updated to address concerns identified through community input and the consultant’s technical review. NOTE: While this assessment follows the current Code outline, the update’s organization will look different. The structure will shift from a form based to more conventional and familiar ordinance format to support more effective regulation. To that end, the I-55 Code update process will include working closely with City staff to ensure that the recommended approaches reflect practices appropriate for Edwardsville. The next step in the update process is for the City Council to review and comment on the findings below, which will set a direction for updating the I-55 District regulations.

## General Provisions & Regulatory Plan (Sections 1 and 2)

Section 1 describes principles that are the basis for I-55 District regulations. These thirteen principles are very specific and speak not only to zoning regulations within the Code but also long-term planning considerations. To confirm the validity of those principles today, the statements were simplified into six objectives for the input workshops. While workshop participants felt that the statements may warrant further refinement, they agreed that the six objectives were comprehensive in describing goals for the District. The updated objectives have their genesis in the current principles, which specify development and aesthetic characteristics, but more broadly describe the spirit of the regulations. These new objectives will guide Code updates and convey the City's intent for short and long-term developments. Compared to current Code principles, the objectives provide greater flexibility without being prescriptive. These objectives will continue to be refined and be adopted with the updated Code.

This current Code section also describes application and review procedures, and highlights other ordinances that are applicable to development in the District, including the Subdivision and Land Development Ordinance, Stormwater, Drainage, and Sediment & Erosion Control, and Building Construction Codes and Occupancy Requirements, etc. A concern about review procedures noted in workshops and focus groups related to the number and sequencing of meetings required for the entitlement process, which can extend the approval process timeline and increasing costs (although the number of meetings also can be a function of applications requiring more in depth consideration as Planned Unit Developments). To consider this issue, the application and review procedures in the I-55 District will be revisited to identify ways in which the processes can be more efficient in implementation of I-55 development goals.

Section 2 includes descriptions and a map of development subdistricts within the I-55 District (Mixed Use Commercial, Town Center, Neighborhood Residential, Rural Residential). These will likely be refined to best establish the intended land uses and character for the area. Given that the District is large (an estimated 2,084 acres lie north of the boundary agreement line with Glen Carbon) there has been recognition that complete development of the area will occur over decades, and needs to be guided in phases to avoid the pitfalls of leapfrog development (solo developments that disrupt consistency of character, public service provision, and community connectivity).

Each input workshop considered the question of scale for the subdistricts and how that related to development potential. For example, the Town Center area, is roughly twice the size of the walkable area of Downtown Edwardsville (roughly 60 acres). The New Town St. Charles development was mentioned in workshops as an example of the development type desired in this area, however, it only has about 12 acres of commercial uses – a fraction of that included in the Town Center portion of the I-55 District. This indication of scale (and current market realities of reduced retail demand) is cause to consider reducing the subdistrict or splitting it into further subareas. There are several related locational considerations, such as whether to concentrate future Town Center development near existing uses (the YMCA and Anderson Goshen Campus) or greater near traffic and visibility (along Governors Parkway). Considering these factors in drafting the Code update can direct new development to balance economic development and place making objectives of the City.

### Lot/Building Types (Section 3.1)

The primary item for evaluating development under the current Code is the lot or building type. This directs which development districts permit a building type and determines several architectural design standards and frontage options. This approach complicates development planning for the developer, and the City’s ability to provide direction regarding bulk (height, setback etc.) requirements – which vary in the current Code based on the final user and type of building constructed. At early stages of development, developers may not know the end user and the architectural vision may not yet be fleshed out. So, from the early, conceptual stages of development the process can become unnecessarily inflexible and restrictive. Because of this uncertainty of end users and construction types at early development planning stages, form-based codes (such as the I-55 District) are a less commonly used zoning tool in undeveloped areas. For the I-55 update, lot/building types are not anticipated to remain part of the Code. Other tools for achieving the intentions of these regulations in a more user friendly and effective manner can be applied and will be explored to determine how to best achieve the spirit of these regulations and Edwardsville’s goals for the District.

Table 3.1.3 Lot/Building Types By Development District.

	Lot/building types														
	Comm., primary	Comm., urban	Parking garage	Office building	Small box retail/drive-	Instit.	Civic	Mixed-use building	Apt/condo	Town house	Villa/attached	SF detached	Estate	Countyside tract	Farm
Mixed-use commercial	Y	Y	Y	Y	S	Y	Y	Y	Y	S	S	–	–	–	–
Town center	Y	Y	Y	Y	–	Y	Y	Y	Y	Y	Y	–	–	–	–
General neighborhood	–	Y	Y	S	–	Y	Y	Y	Y	Y	Y	Y	–	–	–
Neighborhood residential	–	–	–	–	–	Y	Y	–	–	–	Y	Y	–	–	S
Rural residential	–	–	–	–	–	Y	Y	–	–	–	–	Y	Y	Y	Y

Y-Allowed/S-Special use

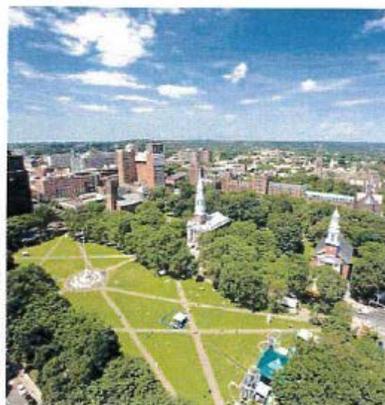
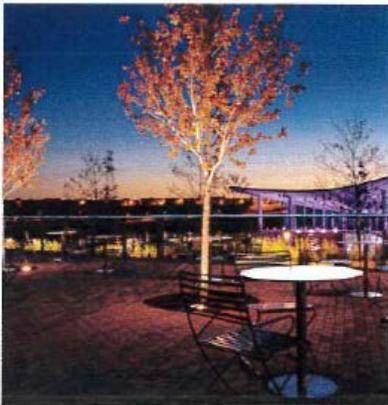
### Frontage Types (Section 3.2)

As described in the current Code, frontage types are “the architectural elements that are attached to or subtracted from a building volume and provide a transition between the outside and the inside of a building”. Examples of these elements in the I-55 Code include common yards, porches, stoops, forecourts, awnings & canopies, storefronts, and bay windows. Each frontage type includes a description, building and site layout conditions, permitted encroachments, and a list of the lot/building types wherein the frontage types are permitted. Frontage types help define the overall character of

buildings in the District. However, they work in concert with lot/building type regulations, which will not be applied in the update (as described above). To meet the intent of these standards, the concepts they outline will be refined and conveyed through Design Guidelines in the update. Feedback from the workshops indicated that some frontage types, like storefronts, common yards, and awnings & canopies, are important to address in the District, whereas others such as stoops and bay windows are less important. Incorporating frontage types into Design Guidelines creates greater efficiency in the review and approval process. As discussed in the workshops, there are cases in which administrative approval by staff could be appropriate and increase efficiency. More significant questions and approvals would still be addressed by the Plan Commission and City Council. How approvals could be delegated to improve efficiency while ensuring that the processes are addressed at appropriate levels will be evaluated.

### **Green Space, Parks and Civic Space (Section 3.3)**

This section describes the types of active and passive green spaces permitted and encouraged through the District. Comments in the workshops and interviews about the I-55 District vision consistently included a desire for widespread landscaping and green spaces, both active and passive, acting as a distinctive feature of the area. In particular, Objective 6, which addresses Environmental Design, was rated highest at the workshops in terms of significance to the District. Conversations in the workshops and interviews highlighted examples where lush streetscapes, trees, and passive open spaces made areas comfortable and inviting—exactly the type of feeling and character desired in the I-55 District. To that end, these requirements will be reviewed in greater detail, ensuring they complement other revisions within the Code and are expanded as needed to emphasize the importance of landscaping and green space as a major characteristic in the District.



### **Architectural Standards (Section 3.4)**

The architectural standards section of the current Code is also organized by lot/building type, and includes requirements for architectural elements, exterior building materials, site design, streetscape, entrances, etc. Standards vary by use (commercial, residential) and are primarily aimed at creating a human scale, safe pedestrian environment and access by car. Based on feedback at the workshops, the most important architectural elements are site design, streetscape and building appearance. The vision conveyed for the District is a high standard of design quality and appearance, reflective of that found elsewhere in Edwardsville. However, the highly prescriptive architectural specifications in the Code limit

design creativity and variety and will be revised. The Design Guidelines developed for the update will reflect the design objectives in a manner that creates greater flexibility, while clearly communicating the desired character of the District.

Discussion in the workshops also indicated that walkability of the area should be a key point in guiding development and as such, the guidelines and regulations will emphasize the pedestrian network to encourage walkability and connectivity between uses/developments.

### **Standards Based on City Code (Sections 3.5 thru 3.12)**

Several development regulations applicable in the I-55 District are drawn from other parts of the City Code: Streetscape, Landscape, Parking, Signage, Lighting, Outdoor Displays and Storage and Infrastructure (the same would be true of development in Glen Carbon or Madison County). Where requirements intentionally differ from City Codes in the I-55 District, they are noted. Most deviations are in relation to parking (location, drives and landscaping) and landscaping/streetscape (specifications for commercial uses). Differences are primarily addressed in the lot/building type and architectural standards sections. For the update, these will be reviewed to ensure that they remain consistent with City goals. To increase the user-friendly nature of the document, any deviations from City regulations will be updated to be easily found and compared with other standards.

### **Planned Unit Development (PUD) (Section 4)**

PUD requirements of the I-55 District provide flexibility when applying District regulations. The need for flexibility was a point of discussions with the Council, Commission, and stakeholders, focusing on recent developments having been approved as PUDs due to a number of regulations that conflicted with user needs. While a goal of the District is to enhance the quality and character of the area, several instances of development approval were noted where requirements were not flexible enough to accommodate desired development and permitted uses without going through the PUD process. This is not in keeping with the intention of the District and highlights the prescriptive nature of the Code as a barrier to efficient implementation. The PUD section of the Code will be reviewed and revised as needed to complement revisions in other sections of the Code and support the use of PUDs as a tool to enhance overall development, rather than mainly accommodating hardships created by the District standards.

### **Land Use (by Lot Type) (Section 5)**

Land uses are permitted either by-right or as special uses within the I-55 District based on Lot/Building Type, as specified by NAICS (North American Industrial Classification System) codes; any land use not listed is prohibited within the I-55 District. This approach characterizes the types and scale of developments that are intended in each subdistrict, differentiating between the desired character of the Town Center and Mixed Use Commercial subdistricts as well as the Neighborhood Residential and Rural Residential subdistricts. This manner of matching permitted uses with area character and building scale can be effective in supporting City development objectives, it will be reviewed and revised to clearly indicate the types of uses and the scale at which those uses are intended in each subdistrict. However, matching uses to building types creates the development planning and phasing issues noted earlier, so this approach will be refined. In addition, the application of NAICS Codes to define permitted and special uses will be reconsidered as it is also highly specific and can lead to a loss of flexibility. Alternatively,

applying clearly defined “land use categories” may provide a more effective balance of desired uses and flexibility in tenanting.

Additionally, given the size of current subdistricts, further dividing those areas will be considered. The benefit of defining smaller, more focused areas is to create clusters of common uses (such as hotels in the Mixed Use Commercial area near the interchange or medical uses in the Town Center near the Anderson Goshen Campus). The PUD process would be applied as an alternative process for developments that propose a variation or mixture of uses and scales.

#### Section 5.4 Retail Land Uses

	Retail Land Uses								
	NAICS Code	Commercial, Primary	Commercial, Urban	Parking Garage/Linear	Office Building	Small Box Retail / Drive	Institutional	Civic	Mixed-Use Building
Furniture + Home Furnishings Stores	442	P	P		P				P
Electronics + Appliance Stores	4431	P	P		P				P
Building Materials + Supplies Dealers	4441	P	P		P				P
Lawn + Garden Equipment + Supplies Stores	4442	P	P		P				P
Supermarkets + Other Grocery Stores (except convenience stores)	44511	P	P		P				P
Convenience Stores	4452	P	P		P	Z			P
P-Permitted-by-right/S-Permitted only through a special use permit/Z-permitted after compliance with Section 5.2									

Several residential types are currently permitted, either within the Neighborhood Residential or Rural Residential development districts. In addition, the area set aside for Neighborhood Residential development is large. Guiding development in this area must take into account that development will occur in phases over a period of time, and initial developments are likely to be concentrated where there are existing linkages to community amenities, and utilities. In addition, interest in constructing residential uses in commercial areas (in Town Center or Mixed Use Commercial areas) can be expected. The Code currently does not address any unique considerations under which such a request may be considered. While the permitted residential uses are not anticipated to change, this section will be reviewed to consider whether language guiding phasing of development and/or how requests by developers for a change in land use designation can be addressed.

#### Update Process

The next step is to review and revise the I-55 District Development Code based on the approach outlined in this report. That process will be iterative; drafted sections will be provided for staff review, revised, shared for public comment, and then presented to the City Council for consideration (and revised as

needed). Drafts will include summary notes on what has changed and what considerations led to those changes, providing specific examples where appropriate.

Community input has indicated that the City's intent for the District largely remains the same. Yet, feedback from City officials, staff, stakeholders, and our technical review indicate that the Code as written is highly prescriptive and does not allow adequate flexibility in implementation. As a regulatory tool, it does not provide a user-friendly process for those involved in the development process. The Code update will focus on that charge, maintaining the community's desired form of development with a more understandable and flexible approach.