

CITY OF ALLENTOWN

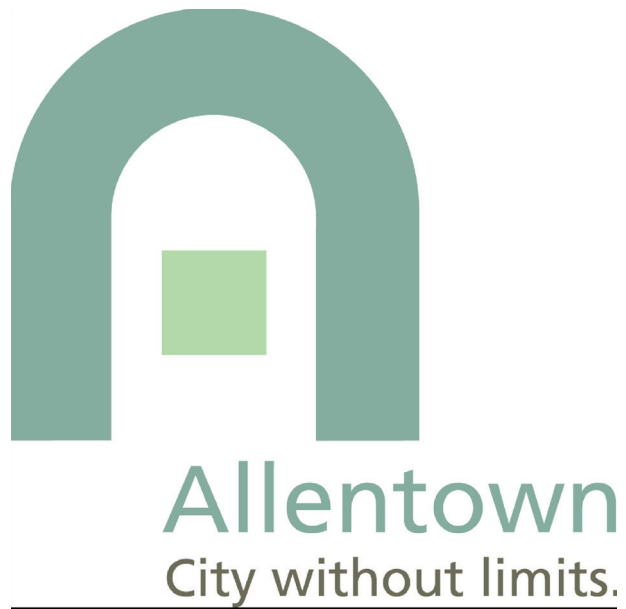
Zoning, Subdivision, and Land Development
Ordinances Update

Project Direction Report

May 2021

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Zoning Ordinance and SALDO Update

The City of Allentown has initiated a project that will result in a complete overhaul of the existing zoning ordinance and subdivision and land development ordinances (SALDO). The update project is being carried out to better align the city's current development-related ordinances with the policies of Allentown's *Vision 2030 Plan* and to provide a more modern regulatory framework for the future.

General Objectives

In addition to ensuring consistency with the city's comprehensive plan, the updated ordinances are expected to:

- Remove obstacles to achievement of the city's economic development goals;
- Streamline development review and approval procedures;
- Promote transparency and appropriate levels of public involvement in the development review process
- Encourage development in targeted growth locations,
- Incorporate updated design standards and new place-making tools;
- Promote walkable mixed-use development patterns;
- Protect stable residential neighborhoods;
- Offer a variety of housing choices and lifestyle options for city residents;
- Ensure consistency with applicable laws; and
- Include illustrations, graphics and navigational features that make the updated ordinances easy to use and understand.

This Report

This report summarizes the consultant team's initial high-level recommendations regarding the scope and direction of the update project. The intent is to provide a sense of the general direction to be pursued in the update effort, not to identify the specifics of every needed or proposed ordinance change. After review by the project advisory group, the report will serve as a general road map for creation of Allentown's new zoning ordinance and SALDO.

In preparing the report, a variety of policy documents and regulations were reviewed to gain an understanding of the city's planning and regulatory framework. This work was supplemented by time touring Allentown and its neighborhoods. This field work was invaluable in translating existing regulations and stakeholder comments into an understanding of actual on-the-ground conditions.

The recommendations in the report represent broadly framed ideas for addressing identified deficiencies within the current zoning, subdivision and land development regulations. They are intended to serve as the starting point for discussion, prior to beginning the ordinance drafting and zoning map preparation work. Recommendations can and will be revised and tailored in response to local reviews and issues encountered as the project proceeds.



The general public will be informed about the zoning ordinance and SALDO project and engaged at key points in the update effort. (Image: *Allentown Vision 2030*)

It is important to point out that any existing ordinance shortcomings stated or implied in the report are not intended to reflect poorly on previous authors or upon public officials and staff charged with administering them. The types of issues identified in this report are commonplace, as land use and planning policies evolve and as regulations are incrementally revised in response to ever-emerging issues.

Key Advisors

Advisory Group

A project advisory group has been appointed to work with staff and the consultant team to help shape the initial draft zoning ordinance and SALDO. The advisory group's role will be to provide local knowledge and policy guidance and to help ensure that various perspectives and opinions are considered when preparing the updated regulations.

User Groups

Individuals who are regular ordinance users and development process participants were invited to participate in small group listening sessions at the beginning of the project. By engaging in discussions with property owners, builders, developers, real estate professionals, civic leaders, neighborhood advocates, and others, these listening sessions provided the consultant team with a first-hand account of the views of groups directly affected by zoning and subdivision regulations.

General Public

During formulation of *Allentown Vision 2030* and other planning efforts, the general public has been engaged and asked to participate in a variety of ways. As a plan implementation exercise, the zoning ordinance and SALDO update demands more targeted and focused participation. Still, it is essential that the general public be informed about the project and engaged at key points in the update effort.

The city's website will serve as a key portal for sharing information about the zoning ordinance and SALDO update project, including the posting of documents and announcements about project meetings and events. Once draft regulations are ready for review, city staff and the consultant team will conduct meetings to introduce the public review draft and solicit input on the updated regulations and zoning map.

Planning Commission

The city planning commission and Lehigh Valley planning commission will have a formal role towards the end of the ordinance update process. As with any proposed zoning text or map amendment, the planning commissions will review the proposed zoning ordinance and SALDO and any zoning map changes and issue recommendations to the city council.

City Council

Towards the end of the update project the city council will conduct public hearings and exercise final decision-

making authority on the proposed zoning ordinance and SALDO text and any zoning map amendments.

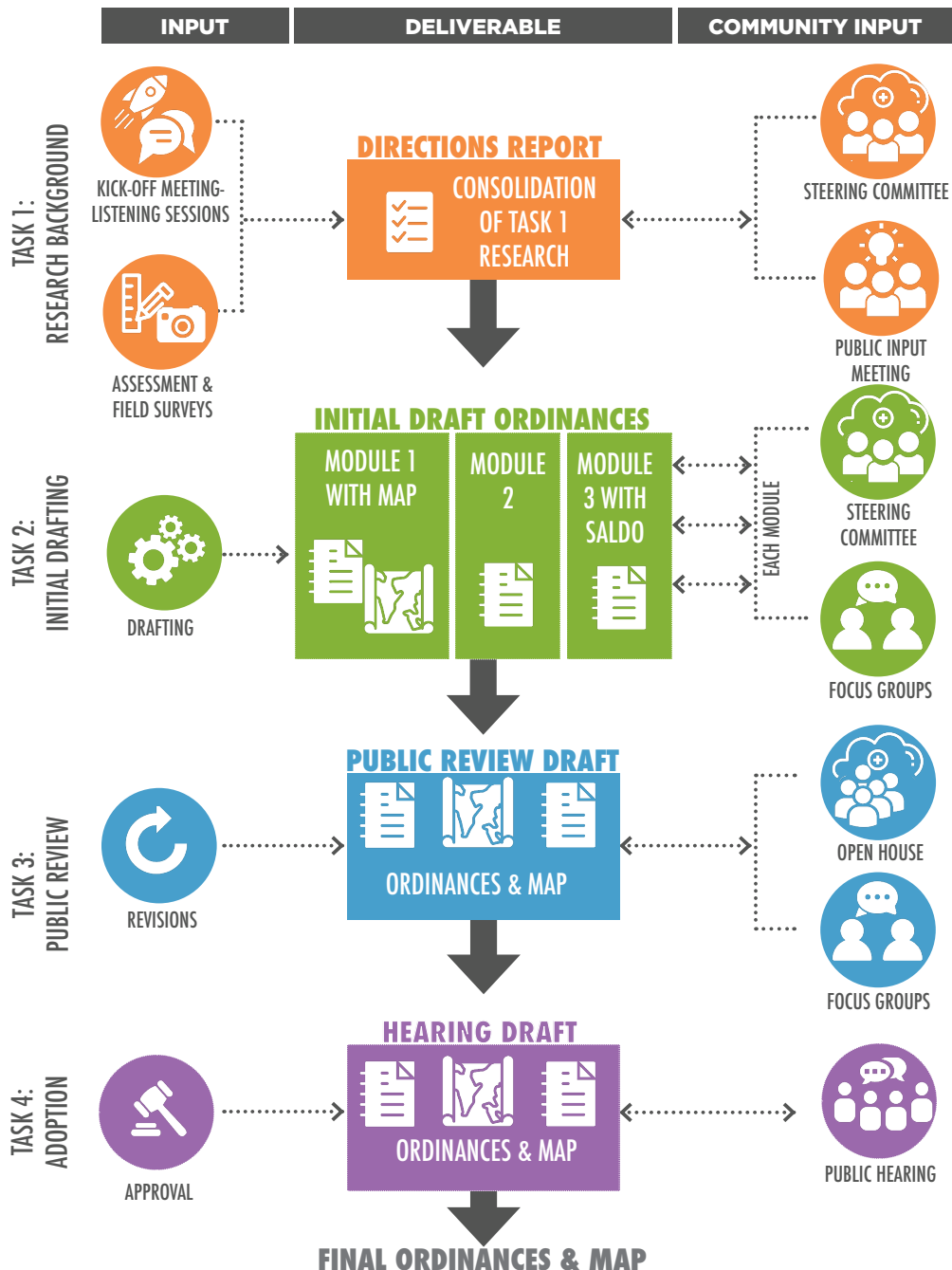
Work Plan

The project work plan, which is expected to take 15 to 15 months to complete, is summarized below.

Consultant Team

The city has retained a consultant team to prepare the new zoning ordinance and SALDO. The team includes Duncan Associates and Codametrics, two firms with a wealth of experience in updating local zoning and development regulations.

Project Work Plan



Listening and learning: what we've heard so far...

As one of the first steps of the update project, city staff and the consultant team held a series of meetings to discuss existing regulations and solicit input from various groups about the types of issues that should be addressed in the updated regulations. The following represent some of the common themes from those conversations:



Reduce Need for Variances

Nonconforming uses and nonconforming lots can pose a barrier for businesses and property owners. Standards that are a frequent subject of variance requests should be examined.



Making Zoning Equitable

Share the benefits and burdens of development and change fairly among all communities.



Communicate Clearly

Continue efforts to communicate zoning and development rules to a diversity of audiences—including those with little to no zoning experience.



Promote Walkability

Zoning regulations should promote pedestrian safety and comfort through activation of the street-level experience.



Increase Housing Choice and Ownership Opportunities

Ensure that zoning allows for a broad range of housing types for all ages, incomes, and lifestyles.



Enhance Clarity, Usability and Predictability

Regulations should be clear, richly illustrated and produce predictable results. Codes should be easy to navigate for all users. Keep it simple!



Make Procedures Clear

Processes should be streamlined, and procedures should be written so citizens understand how and when they can participate in decision-making.



Promote Sustainability

Make greater use of green infrastructure, reduce parking lots and other hard surface areas, and encourage energy efficiency. Increase access to healthy foods and promote healthful living.



Economic Development

The city's economic development goals should help inform the zoning update, including growing the tax base, but growth needs to be equitable and respect context.



Respect Context

New infill and redevelopment should fit the context of the area in which it is located.



Update Hillside controls

Existing regulations treat all hillside and steep slope conditions the same. Lawfully established, human-created slopes should be regulated differently than natural ones.



Protect Established Neighborhoods

Need to provide appropriate transitions between new higher intensity development and existing neighborhoods.



Image: Allentown Vision 2030 Plan

Plan Implementation

The Plan

In December 2019, the City of Allentown adopted *Allentown Vision 2030*, the city’s 10-year Comprehensive and Economic Development Plan. The new plan recommends a complete update and modernization of existing zoning regulations as one of two key “catalytic actions” that will help set the overall plan into motion and fundamentally shift city development patterns. Additionally, the plan identifies several principles and recommended actions that provide an important foundation for the new zoning ordinance and SALDO.

Relevant Plan Principles and Actions

The *Vision 2030* plan is organized around five urban systems that provide a citywide policy framework and a basis for more targeted neighborhood planning:

1. Economic Development
2. Housing
3. Accessibility & Connectivity
4. Services & Amenities
5. Living Systems

For each urban system, the plan identifies a series of “principles” and corresponding “actions,” several of which are specifically assigned to the zoning update project.

ECONOMIC DEVELOPMENT

Principle 1: Increase Local Employment

- Action e: Zoning Update: Neighborhood Mixed-use District

Principle 4: Enhance Land Value

- Action e: Zoning Update: Business Focus

HOUSING

Principle 2: Increase the Quantity of Healthy, Safe, and Affordable Housing

- Action a: Zoning Update: Single Family Housing Focus
- Action b: Zoning Update: Accessory Dwelling Units Focus
- Action c: Zoning Update: Inclusionary Zoning
- Action d: Create an Affordable Housing Overlay.

EAST ALLENTOWN	SOUTH ALLENTOWN	WEST ALLENTOWN	CENTER ALLENTOWN
East Allentown has walkable, transit-rich corridors that connect the neighborhood to regional centers.	Trails and greenways connect the distinct parts of South Allentown to downtown and west.	Enhancing and connecting cultural districts can create a more cohesive neighborhood experience.	Commercial corridor development creates a cultural district adjacent to downtown.
Multi-use, transit oriented development invites people to live in the neighborhood.	Redevelopment of vacant sites can support manufacturing, mixed use development, and commercial uses.	Connection of existing trails with regional trails creates new opportunities to bike and walk to other parts of Allentown.	Transit hubs, streetscape improvements, and one-way conversions create safer and more walkable neighborhoods.
Large redevelopment sites like the Allentown State Hospital can bring jobs, business, manufacturing/industry housing, and public amenities to the community.	A zoning update and new housing allows the neighborhood to continue to attract first-time homebuyers.	Multi-modal hubs encourage transit oriented development.	Commercial clusters develop to serve the local population and become regional attractors.

After describing the urban systems policy framework, *Allentown Vision 2030* applies recommended principles and actions to areas of the city. (*Allentown Vision 2030*)

ACCESSIBILITY & CONNECTIVITY

- No specific zoning actions identified, but updated zoning ordinance and SALDO can play a role in addressing city’s accessibility and connectivity goals.

SERVICES & AMENITIES

- No specific zoning actions identified, but updated zoning ordinance and SALDO can play a role in addressing access to local essential services and amenities.

LIVING SYSTEMS

Principle 3: Increase Environmental Stewardship

- Action c: Zoning Update: Floodplain Alignment
- An updated zoning ordinance and SALDO can also play a role in addressing sustainability, resiliency, community health and other Living Systems principles.

Realignment of the Regulations

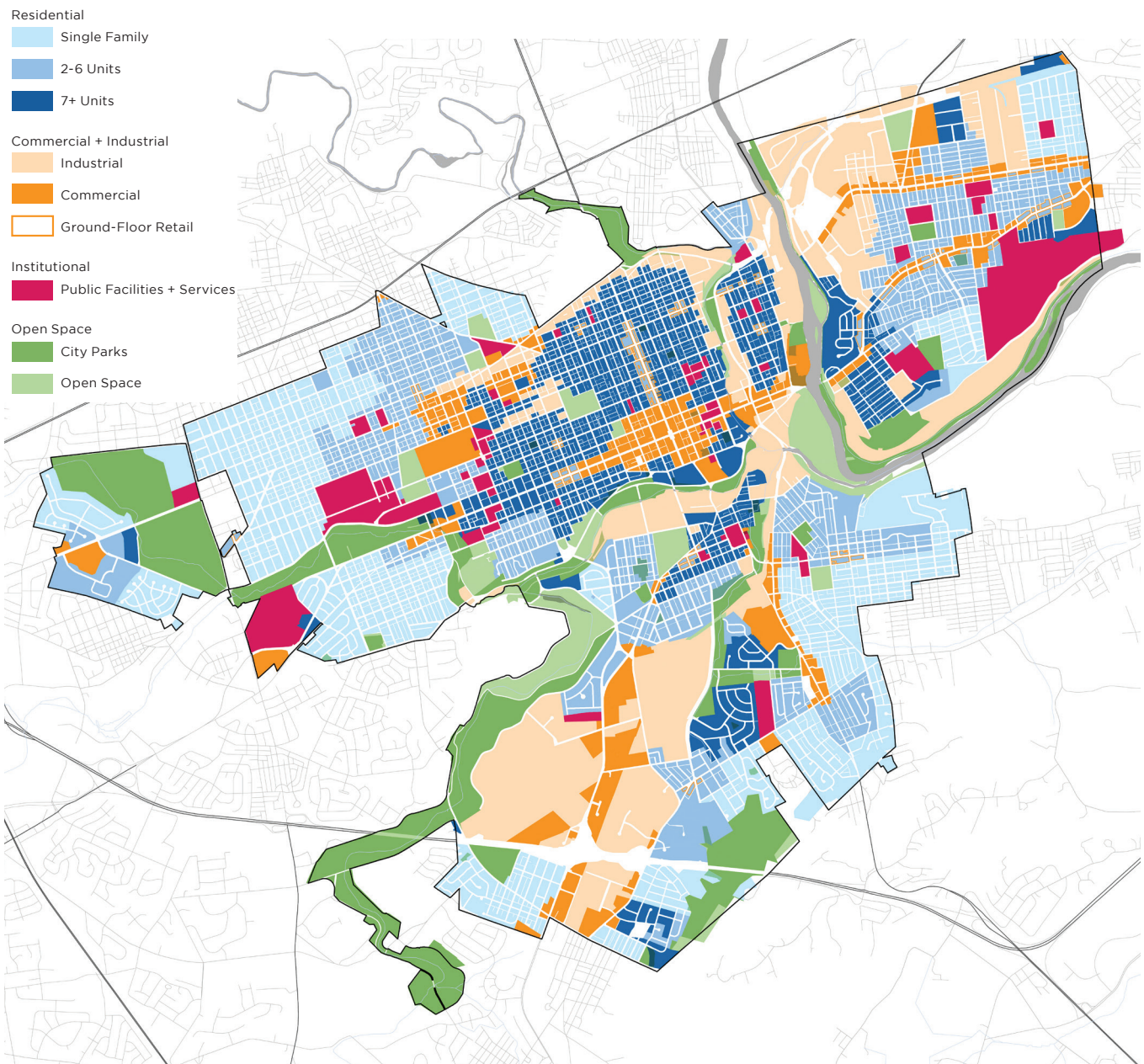
Ensuring that zoning and development regulations are consistent with local plans and include tools necessary to achieve local goals and policies is one the priorities of the zoning ordinance and SALDO update project. This section provides a general overview of the types of changes that will help ensure that the city’s zoning, subdivision, and land development regulations are consistent with and help implement adopted planning policies.

1. Support economic development and employment growth opportunities

As the city’s zoning regulations and map are updated, it will be important to accommodate modern employment-generating land uses and to maintain an adequate supply of land zoned for such uses. Addressing transitions from high-intensity industrial areas to lower intensity neighborhoods will also be an important consideration.

The city’s [2014 Re-Industrialization Strategy](#) reported that the greatest demand for industrial/manufacturing space, aside from warehousing, is for small spaces (up to 8,000 square feet) and spaces between 20,000-80,000 square feet. Ensuring an adequate supply of industrial-zoned land and appropriately sized manufacturing spaces should be addressed in the zoning update. The retention of older office spaces with reasonable rents as well as designating appropriate locations for live-work opportunities can also support burgeoning start-ups and small businesses.

The zoning update also presents an opportunity to better address aspects of the changing workplace (e.g., home occupations) and new economy (e.g., automated, high-cube warehouses, medical marijuana, short-term rentals and food trucks, to name a few).



Existing generalized zoning map (*Allentown Vision 2030*)

2. Create new mixed-use zoning

One of *Vision 2030*'s prominent themes is its call for promotion of walkable, mixed-use development patterns and conversion of single-use zones into mixed-use zones.

In contrast to single-use zoning, mixed-use zoning districts promote a combination of land uses in a given area. Promoting a mix of residential, retail, service and entertainment uses helps create walkable, connected places where people can live, work and play.

Mixed-use can come in the form of “vertical mixed-use” buildings, where different uses are found within the same building (e.g., ground-level storefronts with residential or office space on upper floors). Mixed uses can occur in “horizontal mixed-use” communities where single-use buildings occupied by different land uses are integrated within a single neighborhood or development project.

There are many benefits of walkable mixed-use development patterns. They are more compact and they tend to be more economically viable. They are supportive

of transit and other forms of active transportation. Because mixed-use projects are typically more densely developed, they can also increase property tax revenue for local governments and offer public cost efficiencies in terms of infrastructure and public services. Finally, there is growing evidence that mixed-use environments have positive public health benefits.

New mixed-use zoning districts should be added to the zoning ordinance and such districts should be applied in locations where a change in single-use development patterns is desired. Proposed mixed-use zoning is explored further in the Appendix to this report.

3. Increase housing options and choice

The current zoning ordinance identifies a fairly broad range of residential dwelling types permitted in at least some zoning districts (see table below). At the same time, a relatively large proportion of the city is zoned R-L and R-ML, districts that exclusively permit only single-family detached houses on generously-sized lots (minimum 5,000 and 7,200 square feet, respectively). While a wider palette of residential building types is allowed in other zoning districts, minimum

applicable lot area requirements work to further constrain densities and development options.

The new zoning ordinance can and should accommodate a wider range of housing options by allowing additional housing types in one or more districts. Among the alternative approaches that should be considered are:

- Allowing additional building types in R districts, such as twin houses in some areas now classified in the R-L district;
- Eliminating or at least relaxing existing multi-family density limits and instead focusing on building scale and design-based regulations as the primary control on multi-unit residential and mixed-use buildings;
- Making necessary adjustments to lot and building regulations (area, yard and building requirements to reduce nonconformities (e.g., lot width) and more closely correlate with existing lot patterns;
- Rezoning commercial corridors to better accommodate and promote vertical mixed-use buildings and higher density housing;

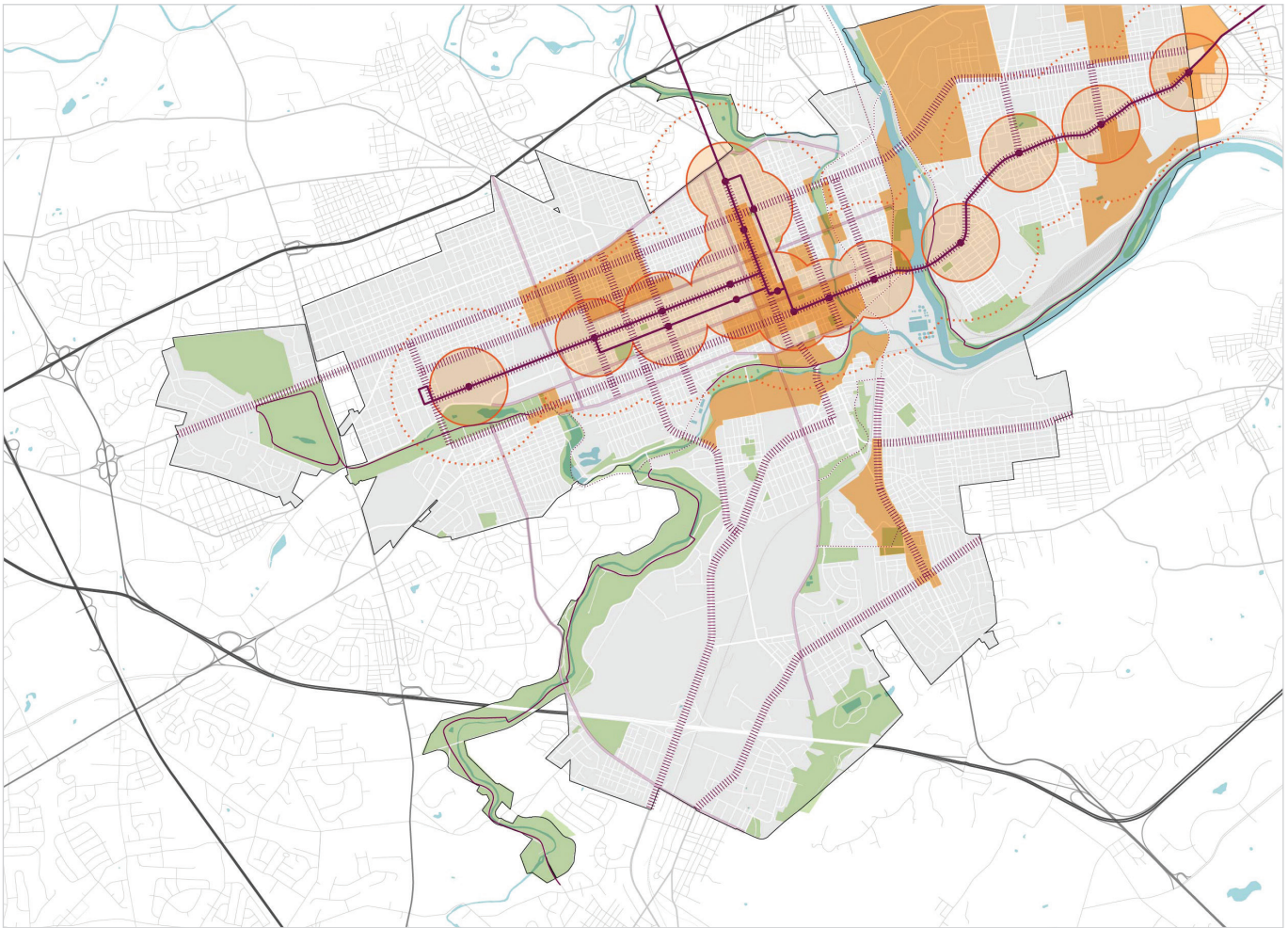
Housing Types Permitted in Residential and Commercial Zoning Districts

Housing Type	R-L	R-ML	R-MP	R-M	R-MH	R-H	B1/R	B2	B3	B4	B5
Detached house	P	P	P	P	P	P	P	P	P	–	–
2-Unit House (Duplex)	–	–	P	P	P	P	P	P	–	–	–
Twin house	–	–	P	P	P	P	P	P	P	–	–
Rowhouse (townhouse)	–	–	P	P	P	P	P	P	–	–	–
Multi-unit (3–4 unit) building	–	–	P	P	P	P	P	P	–	–	P
Multi-unit (5+ unit) building	–	SE	P	P	P	P	P	P	–	–	P
Mixed-use (res + nonres)	–	–	–	–	–	P	P	P	P	–	P

P = permitted as of right | SE = special exception approval required | – = prohibited

Minimum Lot Area Requirements for Residential and Mixed-Use Buildings (Square Feet)

Housing Type	R-L	R-ML	R-MP	R-M	R-MH	R-H	B1/R	B2	B3	B4	B5
Detached house	7,200	5,000	7,200	3,500	2,000	2,000	2,000	2,000	10,000	NA	NA
2-Unit House (Duplex)	NA	NA	varies	4,400	3,600	3,600	3,600	2,000	NA	NA	NA
Twin house	NA	NA		2,000	1,800	1,800	1,800	2,000	10,000	NA	NA
Rowhouse (townhouse)	NA	NA		6,000+	5,400+	5,400+	5,400+	2,000	NA	NA	NA
Multi-unit (3–4 unit) building	NA	NA		12,000+	6,000+	5,400+	6,000+	2,000	NA	NA	4,000
Multi-unit (5+ unit) building	NA	5 Ac.		20,000+	9,000+	7,500+	9,000+	2,000	NA	NA	4,000
Mixed-use (res + nonres)	NA	NA		NA	NA	NA	8,000	varies	2,000	10,000	NA



Citywide Future Land Use Map (Allentown Vision 2030)

LEGEND

- 5- Minute Walk from EBS Stop
 - 10- Minute Walk from EBS Stop
 - Strategic Planning Areas
 - EBS Stop- Proposed
 - Major Intersection
 - Minor Intersection
 - EBS Route- Proposed
 - Existing Trail
 - Proposed Trail
 - Streetscape Improvement
- BASE LAYERS**
- Rivers & Streams
 - City Parks
 - City Blocks
 - Allentown Boundary

- Permitting accessory dwelling units and live-work buildings.

The recommendation to incorporate additional housing options into the zoning ordinance should not be interpreted as a call to necessarily include them in *all* districts or areas of the city, but rather a recommendation to identify an expanded range of options in at least some. It is also important to note that the new ordinance is expected to include new site planning and design criteria that will help ensure that these new housing options can be seamlessly integrated into existing neighborhoods without disrupting their established physical character.

4. Address housing affordability

The zoning ordinance update project offers an opportunity to identify, evaluate and remove unnecessary obstacles to maintaining and providing affordable housing options

throughout the city. Such barriers can come in the form of inflexible density and lot size restrictions, excessive off-street parking requirements and other zoning regulations that directly or indirectly affect the cost of housing.

Beyond these sorts of adjustments, *Allentown Vision 2030* recommends evaluation of “inclusionary zoning” as a potential tool for addressing the city’s affordable housing needs. Inclusionary zoning is an affordable housing production tool that links the production of affordable housing to the production of market-rate housing. Such policies either require or encourage private developers to make a designated percentage of the total housing units in a project affordable to low- or moderate- income residents. In exchange, many inclusionary zoning programs provide cost offsets to developers, such as density bonuses that allow the construction of more units or larger buildings than zoning would otherwise allow. Other programs allow fast-track project approval and permitting.

There is great diversity in the structure and goals of inclusionary zoning programs: some are voluntary while others are mandatory; they are triggered by different sizes and types of market-rate residential developments; they target the affordable units to different income levels; they have different rules about whether the affordable units must be located within the market-rate development or may be located off-site; and they impose affordability restrictions for different lengths of time.

Development of a locally tailored and properly calibrated inclusionary zoning program may be beyond what can realistically be addressed as part of the zoning ordinance and SALDO update project. However the update effort should anticipate future development of such a program and do all that is possible to address housing affordability and equity.

5. Promote increased bikeability/walkability

Walkable neighborhoods and a complete transportation system that includes support for walking, bicycling and transit use are keys to realizing the comprehensive plan’s Accessibility and Connectivity goals.



In surveys conducted for the 2019 Lehigh Valley Regional Comprehensive Plan, 84% of respondents said efforts to promote walking, cycling, and carpooling would best address future transportation and mobility needs. (Image: *Allentown Vision 2030*)

These goals can be addressed at least in part by:

- Reducing or eliminating minimum motor vehicle parking mandates;
- Adding more robust bicycle parking requirements or incentives;
- Establishing clear thresholds for when traffic impact studies are required and criteria for issues to be addressed;
- Requiring that buildings interface directly with sidewalks and that parking be located to the rear or side of buildings, at least in walkable mixed-use areas of the city;
- Promoting context-sensitive building design standards that consider and respond to abutting street types;
- Requiring pedestrian inter-connectivity between sites (and within large parking lots); and
- Requiring master planning of large development/redevelopment sites to include predictable street types, walkable block patterns, and a distribution of building forms.

6. Promote sustainability, resiliency and public health

The Living Systems element of the *Vision 2030* plan includes several recommendations related to natural resource preservation, sustainability, and resiliency. The zoning ordinance and SALDO update project offers an opportunity to advance several of the city’s environmental and public health goals.

The updated regulations should accommodate and promote sustainable development practices and healthy lifestyles through the removal of unintended barriers and the inclusion of appropriate regulations and incentives that address such issues as:

- The use of renewable energy sources;
- Connectivity and walkability;
- Promotion of green development practices, including low-impact infrastructure solutions;
- Zoning for community gardens and farmers markets and other forms of urban agriculture); and
- Continued protection of flood-prone areas and sensitive natural resources.

7. Address community character and context

Community character and quality-of-life issues are of paramount importance to city residents. The “Areas of Allentown” component of



Zoning should not impose unnecessary regulatory obstacles for community gardens, farmers markets, renewable energy use, or the pursuit of other sustainable development practices. (Image: *Allentown Vision 2030*)

Allentown Vision 2030 examines the character of city neighborhood areas and applies the plan's Urban Systems' recommendations specific geographic areas. In doing so, it provides a very important framework for the new zoning ordinance and SALDO.

Plan strategies and guidelines for east, south, west and central areas of the city reflect the desired future vision for the city. As such, these principles will be used to inform the updated zoning district regulations and general development standards to be included the new zoning ordinance and SALDO.

In order to promote comprehensive plan priorities, the new zoning ordinance and SALDO should include additional provisions addressing urban form and basic elements of site and building design. This recommended approach will place additional emphasis on the character and "form" of new buildings and the degree to which development positively contributes to the existing or desired physical (design) character of the city's neighborhoods and growth areas. To the maximum extent possible, these new regulations should consist of *objective, measurable criteria*, thereby enabling a determination of compliance through an efficient, administrative site plan review process (see also recommendation No. [11](#)).



(Allentown Vision 2030)

Other Recommendations

While there is much to do to bring zoning regulations into closer alignment with local plans and policies, the zoning ordinance and SALDO update project also offers the opportunity to modernize existing zoning, subdivision and land development regulations and to address technical and substantive issues. This section describes a few of the modernization, usability and known technical issues to be addressed.

Regulatory Approach

8. Transition to form-based regulations

The update project offers an opportunity to expand the use of form-based controls. Such an approach should reap benefits in terms of greater predictability and promotion of desired urban design and preservation of community character.

Form-based zoning is an increasingly popular alternative to conventional zoning. In simple terms, form-based codes focus primarily on building form or physical character and secondarily on use. In contrast, conventional zoning has historically focused almost exclusively on use. Form-based controls are intended to achieve a particular type of “place,” based on a shared vision for an area.

They have proven particularly effective over the past 20 to 25 years in helping to foster and create walkable, mixed-use communities.

To the extent that conventional zoning attempts to address form or character, it does so in sometimes ineffective ways, relying on abstract concepts such as “dwelling units per acre” and “open space ratios.” Such abstract measures suggest specificity and precision, but they produce unpredictable and often unsatisfying results. A requirement calling for 20% of a site to be set aside as open space, for example, can result in many different site designs and project layouts and thereby reveal very little about how a project will relate to the street or to other nearby buildings. These types of regulations and ordinance

requirements can be difficult for ordinance users to understand and challenging for staff to administer and enforce.

Another way to think about the distinction between conventional and form-based regulations is that conventional zoning regulations generally focus on *proscriptions*, provisions describing the limits of what is allowed (e.g., *don't* build closer to a property line than x, taller than y or more units than z). Form-based zoning regulations, on the other hand, are largely focused on *prescriptions*, regulations describing in some detail the types of buildings and development features that are required (e.g., *do* build within this area and *do* include sidewalk-facing doors and windows). Perhaps more than any other factor, this distinction helps to explain how form-based zoning produces predictable results.

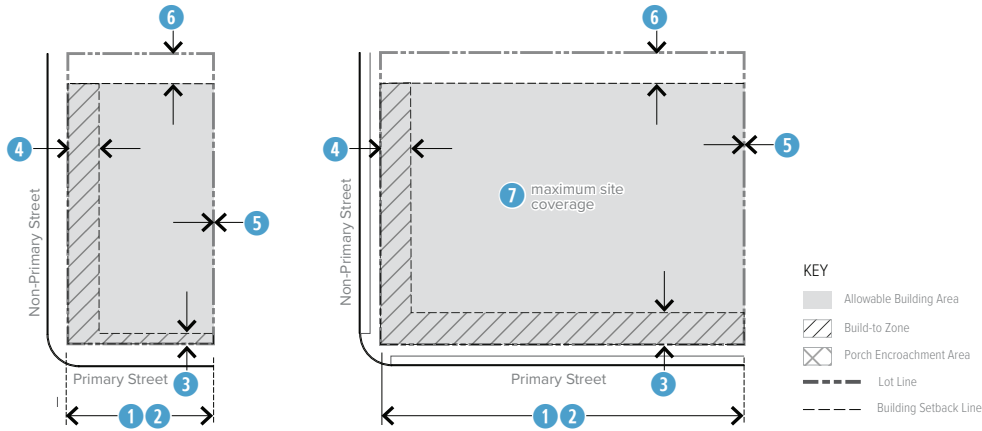
Ordinance Structure

9. Improve organization and format

One of the goals for the zoning ordinance and SALDO update project is to ensure that Allentown's updated zoning and development regulations are easier to use than their present-day counterparts. Substantive regulations should be clear, comprehensive and internally consistent. Administrative and procedural provisions should be streamlined, consistent and easy to understand.

Given the important role that zoning and development regulations play, the new ordinance should be logically organized, well-formatted and easy to use. The document should be laid out in a way that people can find the information they need and written so

Figure 3.20-B. Storefront Building Siting



		ZONES			
		DX1	MX1, MX2	MXN	Additional/References
3.20.4. BUILDING SITING. See Figure 3.20-B					
1	Lot Width	18 ft.	—	50 ft. min.	
2	Primary Street Streetwall	90% min.	75% min.	75% min. 100 ft. max.	See courtyard, outdoor dining, and seating allowances per 3.20.10.A .
3	Primary Street Build-to Zone	0 min. 5 ft. max.	0 min. 15 ft. max.	0 min. 15 ft. max.	Min. pedestrian area required per 3.20.10.B . Through-lots addressed per 3.20.10.D .
4	Non-Primary Street Build-to Zone	0 min. 10 ft. max.	0 min. 15 ft. max.	0 min. 15 ft. max.	See XXX for measuring.
5	Side Setback	0 or, if set back, min. 5 ft.	0 min. Min. 5 ft. adjacent to other building type	0 min.	
6	Rear Setback	15 ft. min.	15 ft. min.	20 ft. min.	Buffer required adjacent to N zones per 3.20.10.I
7	Site Coverage	95% max.	95% max.	85% max.	See XXX for measuring site coverage.

Presenting lot and building regulations in tables, with standards keyed to diagrams, can help convey important information in a way that is easy to understand.

that information can be understood once it is found.

The new regulations should include illustrations and graphics—instead of just long passages of text—to help convey the meaning of regulatory concepts. Generous white space and graphics should be used to enhance the regulations’ visual appearance and improve their usability. Page headers and footers should be used to provide navigational aids to those searching for information within the new ordinances.

User Friendly Ordinance Features

- Plain English
- Tables, charts
- Illustrations/graphics
- Detailed table of contents
- Accurate (hyper-linked) cross-references
- Short sentences, sections
- Consistency (among ordinance sections and with related ordinances)



Flowcharts, such as the sample presented above, will be used to summarize the updated development review procedures.

Administration and Procedures

10. Consolidate and clarify procedures

While subdivision and land development plan approval procedures are presented in a single article of the SALDO (1375), zoning-related permit and approval procedures are interspersed among at least three different articles of the zoning ordinance (1305, 1307, and 1325). All of the city’s key zoning-, subdivision-, and development-related procedures should be consolidated in a single article of the respective ordinances.

The clarity of procedural provisions—and the relationship of site plan and development plans—should be improved through editing, diagrams, and reorganization.

As part of the update, procedures should be edited to be clear, consistent, and time-efficient. The updated procedures should also follow rules of “parallel construction,” so that each respective approval process is set forth using the same general headings and outline sequence.

11. Increase reliance on objective standards

While the bulk of plan and permit reviews under the zoning ordinance and SALDO are based on a determination of compliance with clearly stated regulations, some ordinance provisions, such as the “Site Design Guidelines” of zoning ordinance section 1325.02 constitute rather vague advisory recommendations which are difficult to interpret, administer and enforce.

To the maximum extent possible, Allentown’s new zoning ordinance and SALDO should make use of clear, objective development regulations, which will, in turn, enable more efficient review and decision-making and a more predictable framework for approval of projects that satisfy the city’s objectives for promoting context-sensitive, high-quality development. After all, an efficient, transparent development approval process is one of the best economic development incentives the city can offer.

“The city’s updated regulations should make greater use of clear, objective development standards...”

12. Clarify nonconformity regulations

In zoning parlance, “nonconformities” are uses, lots, and structures that were established in compliance with regulations in effect at the time of establishment, but that no longer comply with zoning regulations because the rules were changed—or were first instituted—after such situations were established. Nonconforming status could be related to virtually anything now addressed by current controls, including failure to meet current use, lot size (area or width), building setback or building height regulations.

Some people confuse “nonconforming” with “illegal.” A more apt description might be “previously conforming,” because it more clearly indicates that such situations did comply with applicable rules at one point in time. The stigma of nonconforming status sometimes results in fairly harsh regulatory treatment.

Analysis to-date indicates that nonconforming lots (ie., smaller or narrower than required by ordinance) exist in some areas. This issue should be addressed as part of the update. Options for consideration include: (a) adjusting existing lot size and setback regulations; (b) creating one or more new districts to be applied in areas that don’t fit existing classifications; or (c) employing some other technique to reduce or eliminate the nonconformities.

In addition, the existing nonconformity regulations should be edited to address issues of clarity and to allow greater flexibility in dealing with nonconforming situations that are not likely to cause substantial adverse impacts on the surrounding area. The “abandonment” provisions of section 1329.04-C will need to be rewritten to more closely reflect Pennsylvania law.

Care will be taken to ensure that any new or modified regulations do not create needless nonconformities or pose a significant stumbling block to context-appropriate redevelopment activities in the city.

Other Issues

13. Ensure compliance with the law

In Pennsylvania, the *Municipalities Planning Code* (MPC) is the uniform planning and land use enabling law for municipalities. Allentown’s updated zoning ordinance and SALDO must be in strict compliance with the MPC.

It will also be important to ensure that the new regulations reflect emerging case law and federal regulations governing issues such as (content-neutral) sign regulations, telecommunications facilities, and fair housing.

14. Update definitions

The definitions section of the new regulations should be comprehensive, modern, easy-to-understand and illustrated. The zoning- and subdivision-related definitions will be pruned, supplemented and revised as necessary to reflect new and revised substantive regulations. Separate sections will likely be set-aside within for new more general use classifications and for measurement-related terms (e.g., how to measure building height, setbacks, facade transparency, etc.).

15. Modernize use classifications

The city’s current zoning ordinance lists well over 100 residential, business, civic/institutional and other uses that may—or may not—be allowed in one zoning district or another. Despite the (high) number of uses listed and defined, the ordinance fails to address a many modern land use and business types in the 21st century.

The use regulations and the way in which uses are classified and defined, should be updated. Instead of listing specific types of allowed businesses with little logic about why one is permitted and another is not permitted, the new zoning ordinance should rely on broader, more modern and generalized categories of defined use.

The current ordinance’s use typology could be simplified and collapsed into a logical,

USES	ZONING DISTRICTS															Reference		
	DT-1	DT-2	DT-3	MS-1	MS-2	MS-3	CX-1	CX-2	ID-1	ID-2	RX-1	RX-2	NX-1	NX-1	NX-3		NX-4	OS
Residential & Lodging Category																	4.3.1	
Household Living																4.3.1.A		
One Dwelling Unit	●	●	●	◐	●	◐	●	-	-	-	●	●	●	●	●	-	4.3.1.A	
Two Dwelling Units	●	●	●	◐	●	◐	●	-	-	-	●	●	●	-	●	●	-	4.3.1.A
Three Dwelling Units	●	●	●	◐	●	◐	●	-	-	-	●	●	●	-	-	●	-	4.3.1.A
Multi-family	●	●	●	◐	●	◐	●	-	-	-	●	●	●	-	-	-	-	4.3.1.A
Micro/Efficiency Units	◐	◐	◐	◐	◐	◐	◐	-	-	-	◐	◐	◐	-	-	-	-	4.3.1.A
Bed & Breakfast	-	-	●	◐	◐	◐	●	-	-	-	●	●	○	-	-	-	-	4.3.1.B
Emergency Shelter	◐	-	-	-	-	◐	◐	-	-	-	-	-	-	-	-	-	-	4.3.1.C
Group Living	●	●	●	◐	◐	◐	◐	-	-	-	◐	◐	◐	-	-	-	-	4.3.1.D
Hotel/Apartment Hotel	●	●	●	●	●	●	●	-	-	-	●	●	-	-	-	-	-	4.3.1.E
Residential Care, Small	-	-	-	-	-	-	◐	-	-	-	◐	◐	◐	-	-	-	-	4.3.1.G
Residential Care, Large	●	●	●	●	●	●	●	-	-	-	●	●	-	-	-	-	-	4.3.1.H
Roominghouse /SRO	◐	-	-	-	-	-	-	-	-	-	-	◐	◐	-	-	-	-	4.3.1.I
Civic & Institutional Category																	4.3.2	
Assembly, Neighborhood	○	○	○	○	○	○	○	○	-	-	○	○	○	○	○	○	○	4.3.2.A
Assembly, Community	○	○	○	○	○	○	○	○	○	○	-	○	-	-	-	-	○	4.3.2.A
Hospital/Government/Universities	○	○	○	○	○	○	○	○	○	-	○	○	○	-	-	-	-	4.3.2.B
Library/Museum	●	●	●	●	●	●	●	●	-	-	●	●	○	-	-	-	-	4.4.1.C
Police/Fire	○	○	○	○	○	○	○	○	-	-	○	○	○	-	-	-	-	4.3.2.D
School: Pre-K, Elementary, Intermediate	○	○	○	○	○	○	○	○	○	-	○	○	○	○	○	○	-	4.3.2.E
School: High School, Higher Education	○	○	○	○	○	○	○	○	-	-	○	○	-	-	-	-	-	4.3.2.F
Stadium/Arena	○	○	○	-	-	-	○	○	○	○	-	○	-	-	-	-	-	4.3.2.G
Transit Station	●	●	●	●	●	●	●	●	●	●	○	○	-	-	-	-	-	4.3.2.H
Open Space Category																	4.3.3	
Park	○	○	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	4.3.3.A
Intensive Park Uses	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	◐	4.3.3.B
Cemetery	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.3.3.C
Community Garden	-	-	-	○	○	○	○	○	○	○	○	○	○	○	○	○	○	4.3.3.D
Honey Beekeeping	-	-	-	-	-	-	-	○	○	○	○	○	○	○	○	○	○	4.3.3.E
Urban Farm	-	-	-	-	-	-	○	○	○	○	-	○	○	-	○	○	○	4.3.3.F
Retail Use Category																	4.3.4	
Neighborhood Retail	●	●	●	●	●	●	-	●	-	-	◐	◐	-	-	-	-	-	4.3.4.A
Convenience Grocery Store	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.3.1.A

- Permitted by right
- ◐ Permitted by right in upper stories only
- ◑ Permitted by right subject to use-specific regulations
- Special Use approval required
- Prohibited

well-defined use classification system that includes just a few broad land use *categories*. This change would eliminate an outmoded system of use regulation and allow the city to better respond to economic and technological changes over time.

16. Right-size parking requirements

The zoning ordinance’s minimum off-street parking ratios require more vehicle parking spaces than many modern zoning ordinances, especially those of largely built-out cities. Excessive off-street parking requirements can inhibit reuse of older buildings and stymie infill and redevelopment efforts (especially on smaller lots) and can lead to the over-development of parking infrastructure. Existing parking requirements also predate cultural and technological shifts that are or will be resulting from trends such ride-sharing and greater use of autonomous vehicles.

Existing Parking Requirements

Use/Building Type	Min. Spaces per Unit
Multi-family residential	1.5 per dwelling unit
Other residential	2.0 per dwelling unit
Professional Offices	3.33 per 1,000 sq. ft.
Medical Office	5 per 1,000 sq. ft.
Banks	4 per 1,000 sq. ft.
Retail	5 per 1,000 sq. ft.
Restaurants	1 per 4 seats

Under the current zoning ordinance most residential buildings are required to provide at least 1.5 to 2 parking spaces per dwelling unit regardless of dwelling size or bedroom count. Excessive residential parking requirements can result in an increase in the cost of housing, which is inconsistent with the city’s stated policy of encouraging production of housing that is affordable to a broader cross-section of residents.

All existing minimum parking ratios should be re-evaluated during the update. Where appropriate, existing requirements will be recommended for reduction or even elimination, particularly within walkable mixed-use areas.

As mentioned above, “right-sized” minimum parking ratios can help to address infill and

redevelopment challenges and reduce the cost of development. Reducing minimum parking requirements can help reduce the amount of hard-surface area on a site which means reduced stormwater runoff impacts and decreased flooding risks. Lowering the amount of area that is required to be paved can also reduce the urban heat island effect caused by the sun’s heating of large paved areas. Reducing the amount of land area devoted to surface parking lots can also reap community appearance benefits.

Other parking changes that will likely be proposed as part of the code update include:

- Updating/upgrading existing bicycle parking provisions;
- Exploring the use of context-based parking requirements (i.e., variable requirements by location, as is now done in the parking overlay that applies to downtown) or even maximum parking ratios for some types of uses;
- Evaluating the use of new requirements for pick-up and drop-off zones to accommodate ride-sharing and delivery services;
- Promoting greater use of shared parking and allowing greater flexibility for meeting parking and transportation access demands (e.g., giving as-of-right credit for abutting on-street parking spaces, nearby public parking spaces, and other features and amenities that provide transportation/access options for city residents and workers; and
- Addressing parking (and charging/fueling facilities) for alternative fuel vehicles.

17. Focus on context-sensitive landscape practices

The updated regulations should include a consolidated section of landscape and screening regulations, which can include different standards for different character areas, districts, building types or contexts.

18. Remove content-based sign regulations

Article 1319 of the city’s zoning ordinance currently includes several sign-related definitions and standards that identify the

“Reducing or eliminating minimum parking requirements can help reduce the amount of hard-surface area on a site which means less stormwater runoff and decreased flooding risks. Lowering such requirements can also reduce the urban heat island effect caused by the sun’s heating of large paved areas and reap community appearance benefits.”

type of content or message allowed on subject sign types. The new regulations should adhere to a more content-neutral approach to sign regulation in order to avoid First-Amendment challenges, based on U.S. Supreme Court rulings.

19. Update telecommunication facility regulations

The city’s existing regulations and procedures governing wireless telecommunications facilities need to be reviewed and revised to ensure consistency with applicable laws, including the Pennsylvania’s *Wireless Broadband Collocation Act*.

20. Make steep slope regulations more flexible

Section 1317.04 of the zoning ordinance limits a property owner’s ability to alter areas of a development site containing steep slopes (in excess of 25% slope).

The Pennsylvania Municipalities Planning Code expressly identifies steep slopes as natural features eligible for protection through zoning or other form of municipal regulation. While the city’s regulations are well-intended and generally sound, they fail to distinguish between natural and human-made slopes. As result, they are a frequent subject of zoning relief requests. As part of the update, consideration should be given to carving out some form of exemption for development on slopes that were lawfully created by grading (provided they were not steep slopes before the grading activity).



Appendix: Building Types Study

This appendix outlines the process for defining a series of building types that exist in the city of Allentown, a first step towards the development of a new set of zoning districts. This process is intended to document the dominant building forms, in order to establish an initial framework for the new zoning districts and to frame pertinent questions to be answered during this initial code-drafting process.

This building types study is a first step in a long-term process and provides initial information to help guide that process. The mapping linked below illustrates where distinct building types occur; these draft maps will help define new zoning districts during the code-drafting process.

[Allentown Building Types Draft Map - EAST & CENTRAL](#)

[Allentown Building Types Draft Map - SOUTH](#)

[Allentown Building Types Draft Map - WEST](#)

Preserving the existing building form can reduce the investment needed to improve a property and install an active, viable use, and, in the process, retaining the character of an area's building form into the future. In some cases, however, the condition of the existing building may be such that reconstruction is necessary. Using building types, the new construction will fit the character of the area.

In other cases, the existing building form is not the desired character for the future and new construction is anticipated occur. These areas of significant change, some identified in the comprehensive plan, will be further studied as the process progresses. Building types

identified in other areas of the city are proposed to be used in these areas of significant change.

Building Types

Building types are illustrated and discussed on the following pages. Each parcel in the city has a building type defined for it, designated on the maps in the links above. This information will help map and define new zones during the first phase of the zoning rewrite process.

A set of proposed initial zones is also outlined at the end of this appendix to begin discussion on application of the building type information to the new regulations. The table included in this subsection also provides an overall list of the building types included. Note that some building types may be defined as occurring in the city, but undesirable for the future. Those are noted in red on the table and proposed to be handled through a different building type.

Finally, at the end of this appendix, a brief description of the process of defining building types for residential and mixed-use/commercial areas of the city is outlined as background information.

Storefront Building

Storefront buildings are built up to the sidewalk with larger storefront windows on the ground story. Entrances are located directly off the sidewalk, allowing a pedestrian to enter multiple shops along a block or district within a short walking distance.

Most storefront buildings are multiple stories and include a mix of uses, organized vertically in the building. Shops and services are located in the ground story with offices or residences in the upper stories. Hamilton Street in the downtown and 7th Street just north of downtown

has excellent examples of Storefront buildings, but they also occur on many street corners within Allentown's neighborhoods.

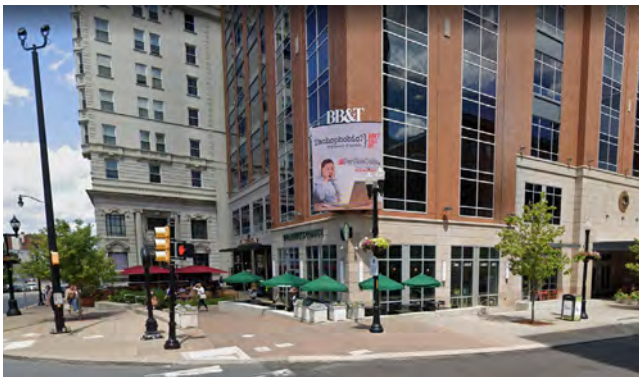
Roofs are usually flat with a parapet, but in the neighborhoods, some pitched roofs occur. Most commercial buildings with a pitched roof are categorized as Commercial Houses.

Storefront buildings on ends of blocks in neighborhoods often extend the full depth of the lot with some units accessed from the side street.

Multi-Story Mixed-Use Storefront Buildings in the Downtown



New Construction Storefront Buildings in the Downtown



Storefront Buildings on Major Street Corridors (7th, 19th)



all images from Googlemaps.com unless otherwise noted

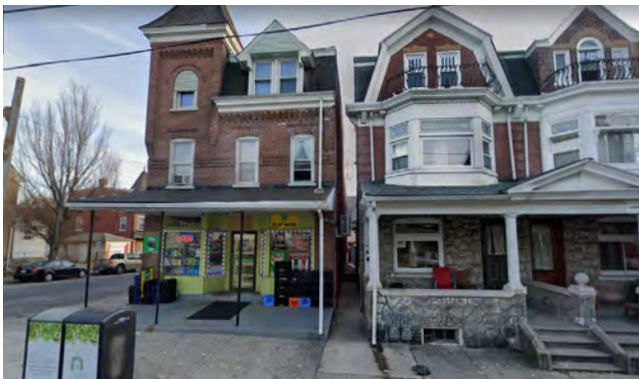
For the purposes of mapping, Urban Rowhouses that have been converted to have a ground story with similar characteristics to other storefronts have been included in this category. The ground floor is typically located up a few steps from the sidewalk and ground story “storefront” windows are usually just a large picture window. The Urban Rowhouse conversions also retain the pitched Rowhouse roof with dormers.

Also, buildings that were originally storefronts but the windows have been either significantly reduced or completed blocked up are included.

BUILDING CHARACTERISTICS

- 2- to 3-stories in neighborhoods and on corridors; 3- to 12+-stories downtown; some single story and taller in neighborhoods
- Built up to the front lot line and sidewalk, parking in rear, if provided
- High level of ground story windows
- Entrances along the sidewalk at sidewalk elevation except for Rowhouse conversions

Small Storefront Buildings on Corners in Neighborhoods



Freestanding Storefront Building on Corner in Neighborhood



Urban Rowhouses Converted to Storefronts



Storefront Buildings with Covered, Blocked Up Windows



Commercial House

The Commercial House includes houses converted to commercial uses, such as offices, restaurants, and particularly funeral homes. Sometimes new construction mimics this type of building form; however, few instances of those exist in Allentown.

Commercial House buildings that have been converted to offices often retain most of the exterior characteristics of the original house. The use, however, means that accessibility ramps, additional parking spaces, and signs may be added. Building additions are also often included.

BUILDING CHARACTERISTICS

- Retains a typical house envelope, usually with a pitched roof and front side yards
- Office - retains house-like ground story
- Storefront conversions - lower level of glass and door is a few steps up
- Parking is generally on side or located in rear
- Signs may be managed differently than on a Storefront building

Commercial Houses



Rowhouse Converted to Commercial House



Twinhouses Converted to Commercial Houses



Commercial Center

Commercial Center buildings are more automobile-oriented than any other commercial building type. This building type includes multiple categories of buildings, including small and large strip shopping centers, gas and service stations, auto sales, and drive-through businesses.

For Commercial Center buildings, parking or drive-through lanes is a dominant feature. The building design is often secondary as it is less visible than the parking. However, some examples of centers with buildings built up to the street and a pedestrian-oriented entrance exist in Allentown.

BUILDING CHARACTERISTICS

- 1-story buildings; usually single use
- Parking lots, drive-through lanes, or vehicle access dominate the site, usually with little landscape
- Garage bays for vehicle service uses are often included
- Facades generally include some storefront glass.
- Best examples include entrances off the public sidewalk, though most are off a parking lot.

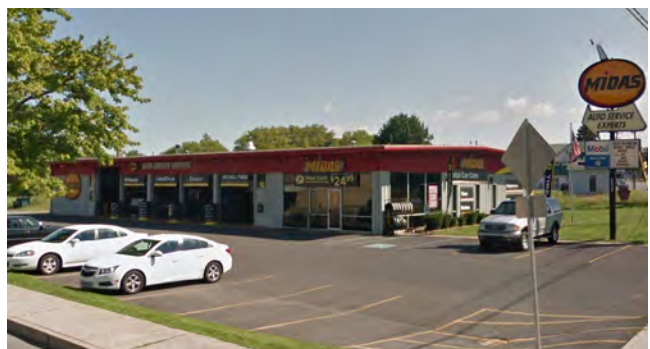
Commercial Centers with Entrances at Public Sidewalk



Strip Shopping Centers



Gas Stations and Auto Service Centers



General Building

The General building type is a larger scale version of the Small General Building. 3 or more stories in height, this building type includes windows arrayed along all stories and a principal entrance on the front facade. The first story typically includes lobby and other common space on the primary street and may include units on side streets or off of Hamilton in downtown.

In the downtown, this version of the General building includes apartments, condominiums, banks, and offices. Few examples of this longer and taller version occur outside of downtown, such as hospitals and universities.

Newer versions include embedded parking structures.

BUILDING CHARACTERISTICS

- 3- to 10+ stories in downtown
- Lobby entrance on the front facade
- Consistently spaced windows on primary street facades
- Parking is located in the rear or embedded in the building
- Ground story includes common uses, especially at corner, and residential uses

General Buildings in Downtown



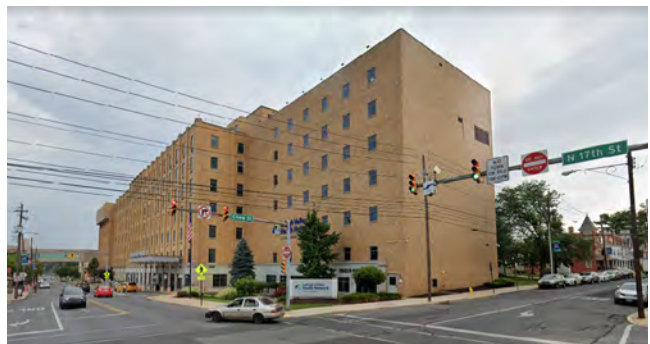
New General Building - Walnut Street Commons



New General Building - Center Square Lofts (image from ANIZDA)



Hospital Building outside Downtown



Small General Building (Apartments)

The Small General (or Flat)¹ building is a multi-unit building, where the units are accessed from an interior shared corridor.

In the earlier part of the 20th century, these mostly brick buildings fit well within neighborhoods due to their limited width and location on block ends. Some also occur as part of a more intense street corridor. In the middle of the 20th century, pockets of multiple buildings were developed.

Quads, 3-flats, and “6-packs”² (small, stacked multi-unit buildings) are included in this description, especially if built prior to 1950.

- 1 Discuss appropriate localized term
- 2 **What is the local term for these?**

BUILDING CHARACTERISTICS

- 2- to 3-story brick buildings built close to and oriented to the street
- Lobby entrance on the front facade
- Building width is usually less than 45 feet
- Consistently spaced windows on street facades
- Parking is located in the rear as part of the mid-century developments, where the earlier buildings may have no or very little parking.

Small General Buildings in Neighborhood Context



General Buildings along Larger Street Corridors

New Infill General Building Next to Muhlenberg College



6-Unit General Building

Larger General Building on Corridor (127 feet long)



Small General (Office) Buildings

With similar characteristics to the Flat or General building for residential uses, the General (Office) building type is a fairly generic building form that is typically a stand alone building. Windows are arrayed along all stories with a principal entrance on the front facade. The first story has similar uses and a similar window treatment as the upper stories.

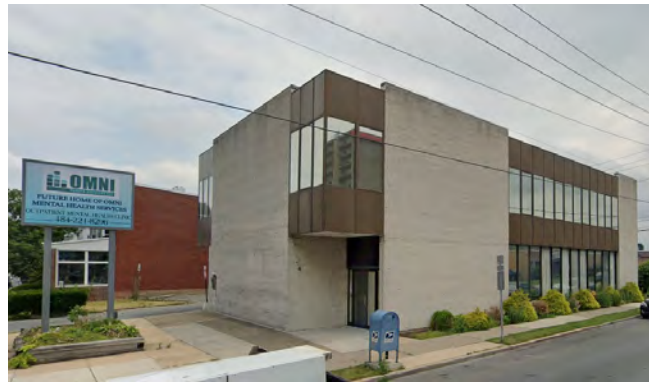
Banks, hospitals, single-use office buildings are typical uses for this building type. Civic buildings (county, federal, and city offices) are often a version of this building type.

Many of the best examples of this building type occur in the downtown, but smaller-scaled versions occur within neighborhoods and along major street corridors.

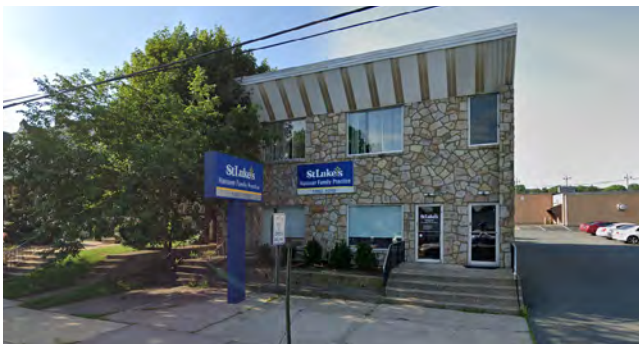
BUILDING CHARACTERISTICS

- 1- to 3-story buildings in neighborhoods
- Lobby entrance on the front facade
- Consistently spaced windows on primary street facades
- Parking is located to the side or in the rear
- Typically masonry construction

General Building in Neighborhoods or on Corridors



Small General Office Buildings in Downtown



Suburban General (Apartment) Buildings

The Suburban Apartments building type is detached multi-unit building, where the units are accessed from an interior shared corridor.

Mainly constructed after about 1950, these buildings occur within neighborhoods, along corridors, or as pockets of multiple buildings, usually outside the older, central area of the city. Two key characteristics of these buildings are their larger front yard areas, usually lawn, and the long, horizontal orientation of the buildings.

In a newer form, multiple buildings are organized along parking lots in western Allentown (the Trexler Park Apartments), creating a fairly dense development of hundreds of similar units.

BUILDING CHARACTERISTICS

- 2- to 3-story buildings built facing the street or parking lots
- Lobby entrance on the front facade (except newer development has open stairwells)
- Consistently spaced windows on street facades, though windows are often small with more blank wall space than older buildings
- Parking is located in the rear except newer development, where buildings front on parking lots.

Suburban General Buildings



Suburban General Building (Apartment Complex)

Suburban General Building (Apartment Complex)



Urban Rowhouses

Urban Rowhouses are a very common building form in the oldest parts of Allentown, typically built prior to 1915. Urban Rowhouse buildings include multiple units, where each unit is vertically oriented and shares a wall with the next unit, creating long buildings with multiple entrances along the street. Parking is located in the rear yard, accessed off an alley or lane.

Many 3 story, flat-roofed versions exist, though the most common version is 2.5 stories with a single dormer in the half story. Similar to the Town Rowhouse, lots on corners take advantage of side street frontage and often include multiple units, but also often include storefronts on the

Typical Urban Rowhouses



3-story Urban Rowhouses

ground story. In some instances, commercial space is interspersed in these buildings along the street, usually on a main corridor.

The Urban Rowhouse is built up to the sidewalk, typically with a stoop, in contrast with the Town Rowhouse's setback and porch. These buildings are also lower in overall height than the Town Rowhouse.

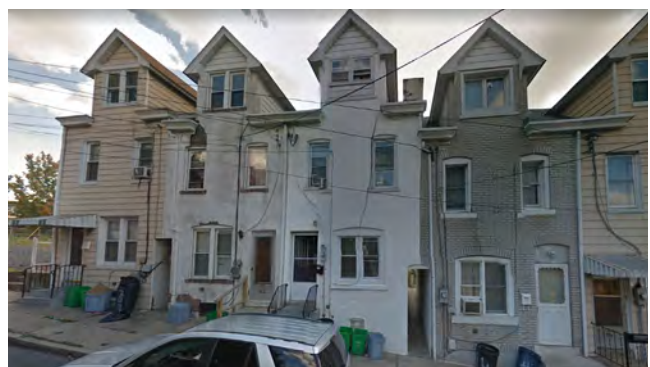
Blocks in the older parts of town are smaller, so while many rows of units extend the full block face, the rows tend to be fewer units than the Town Rowhouse. Detached units and twin units with the same features are mapped for the purposes of this character study as Urban Rowhouses.



Urban Rowhouses



12-foot wide version on a hill



Commercial use on end of block.



Typical Urban Rowhouses with awnings and stoops



Typical block layout showing backyards. (Lane Rowhouses located in center of block.)



BUILDING CHARACTERISTICS

- Vertically oriented units share a wall with the next unit; twinhouses and a few detached versions are categories as this same type
- Predominantly 2.5 stories; 3 stories are common
- Built up to the sidewalk with limited porches or overhangs; usually a stoop entrance with no front yard.
- Rear yards are common off rear lanes; few garages; Lane Rowhouses in rear are common.
- Consistent, flat streetwall is typical with vertically oriented double-hung windows; few bays

Town Rowhouses

Town Rowhouses are one of the most common building forms in Allentown, typically built between the 1880s and the early 1930s. Town Rowhouse buildings include multiple units, where each unit is vertically oriented and shares a wall with the next unit, creating long buildings with multiple entrances along the street. Parking and garages, if provided, are located in the rear yard, usually accessed off a lane or alley.

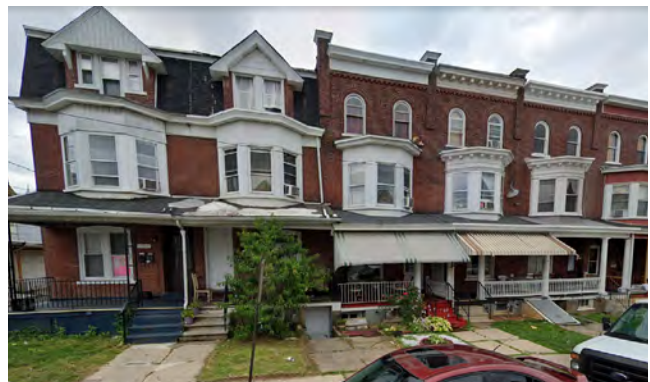
A two-story, flat-roofed version is ubiquitous, built between late 1920s and mid 1930s. In many instances, 3-story rowhouses with a flat roofs are interspersed within

a row. Often end houses take advantage of side street frontage and include multiple units.

Often on corners, a storefront building will be located abutting the Town Rowhouse. Very few rowhouse units in this building type appear to have been converted to retail, service, or office uses, perhaps because most Town Rowhouses are elevated above the sidewalk and include deep porches.

Many buildings extend the full block face, more than 10 units in length. A twinhouse matches this building type and occurs at times along the same block face.

Typical Town Rowhouses



Typical Town Rowhouses



2-story Version (1920s-1930s)



Stacked Units on End of Building



BUILDING CHARACTERISTICS

- Vertically oriented units share a wall with the next unit
- Predominantly 2.5 stories; a 2 story later version exists; 3 stories sometimes interspersed
- Deeper front setbacks (compared to Urban Rowhouse) always with an open or enclosed porch, sometimes with front yards
- Rear yards and garages are common off rear lanes
- Bay windows common on second story; third story windows typically in dormer; corner unit towers are common.

Typical Town Rowhouses with 3-story versions interspersed and tower on block end.



Typical block layout showing backyards. (Lane Rowhouses located in center of block.)



Lane Rowhouses

Lane Rowhouses share many characteristics of the Urban Rowhouse, but are built on narrow alleys or lanes. Lane Rowhouse buildings include multiple units, where each unit is vertically oriented and shares a wall with the next unit.

Lane Rowhouses are typically shallow with no yard. Parking is not provided on the lot; in fact, the building often occupies the entire lot. The Urban Rowhouse is built right up to the alley or lane. Where elevation requires an elevated stoop for access, the stoop is often entered from the side. Otherwise, a doorway directly off the lane is provided.

Typical Lane Rowhouses



BUILDING CHARACTERISTICS

- Vertically oriented units share a wall with the next unit; twinhouses and detached versions are categories as this same type
- Predominantly 2.5 stories
- Built up to the alley/lane with stoop; some shallow porches.
- No yards or parking typically provided.
- Consistent, flat streetwall is typical with vertically oriented double-hung windows; few bays



Suburban Rowhouses

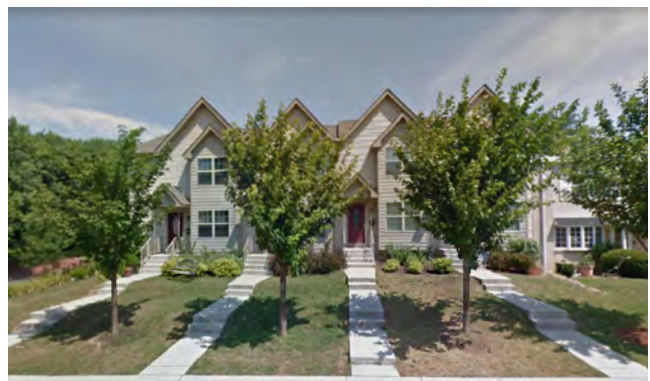
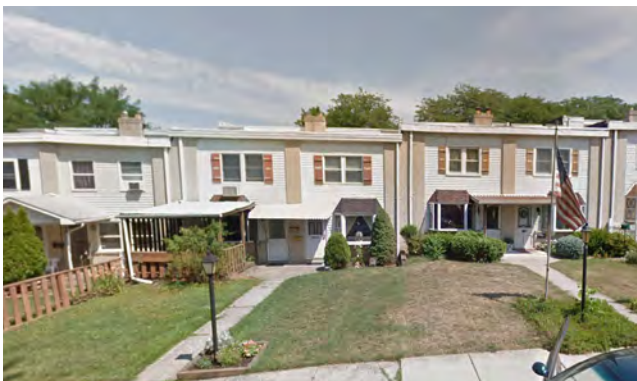
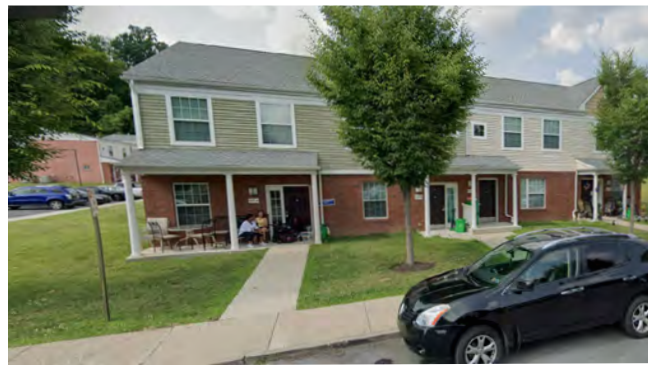
The Suburban Rowhouse building type includes any rowhouse developed after about 1940. Suburban Rowhouses include multiple units, where each unit is vertically oriented and shares a wall with the next unit. Each unit includes its own entrance on the street and windows facing the street. The buildings are set back from the street, providing a front yard area.

In some instances garages or parking is provided in the front yard; however, many examples provide the parking in the rear of the building.

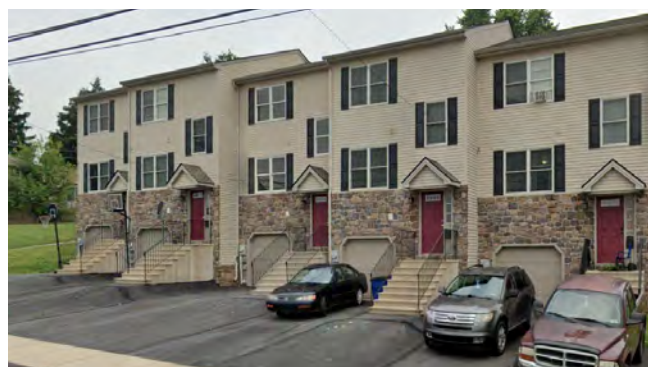
BUILDING CHARACTERISTICS

- Vertically oriented units share a wall with the next unit; twinhouses and detached versions are categories of this same type
- 2 stories or 3 stories (2 over a garage)
- Generous front setbacks
- Windows and doors located on street facade
- Dominant facade material is typically some type of lap siding

Typical Suburban Rowhouses



Suburban Rowhouses with Garages on Front



Town Twinhouses

Twinhouses share many characteristics of the Town Rowhouse but includes just two units side by side, sharing a wall. (Note that two units of an Urban Rowhouse is designated an Urban Rowhouse.) Parking is located in the rear yard, off an alley or lane. .

A two-story, flat-roofed version was built between late 1920s and mid 1930s, some with a parapet. In some locations, several of these twinhouses have been converted to offices; very few have been converted to other commercial uses, though in some cases basements or other additions include restaurants, services, or retail..

BUILDING CHARACTERISTICS

- Side-by-side units share a wall
- Predominantly 2.5 stories; a 2-story later version exists; few 3-story versions; some bungalow twinhouses 1.5 stories
- Deeper front setbacks (compared to Urban Rowhouse) typically with an open or enclosed porch
- Rear yards and garages are common off rear lanes

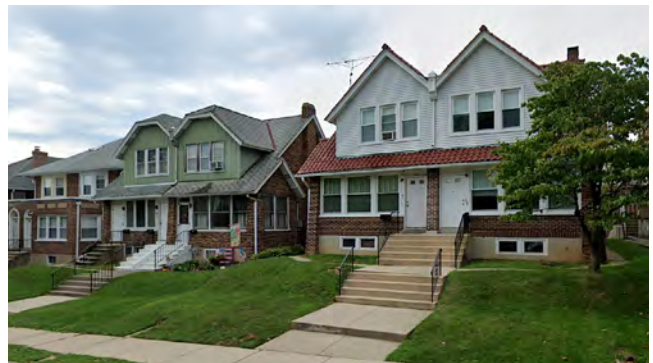
Typical Town Twinhouses



1.5-story Bungalow Versions of Town Twinhouses



2-story Versions of Town Twinhouses



Suburban Twinhouses

The Suburban Twinhouse is a building type with two side-by-side units sharing a wall, developed typically after about 1935, many as part of larger developments with many units.

Parking is typically provided in the rear, along with a rear yard; however, some examples exist with a front yard parking pad. Some developments have shared parking lots or open space behind the buildings in the center of the blocks.

Because there are so few, stacked 2-units developed during this similar time period are mapped as this type.

BUILDING CHARACTERISTICS

- Side-by-side units share a wall
- Predominantly 2 stories
- Front yards; sometimes includes front surface parking
- Side driveways with access to rear parking or garage
- Early versions are mainly brick; later versions mainly some type of lap siding

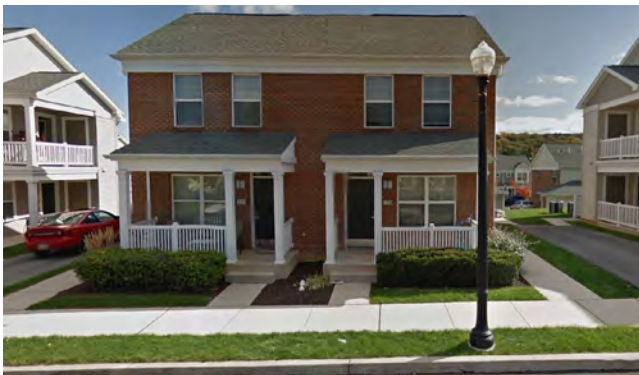
Suburban Twinhouses



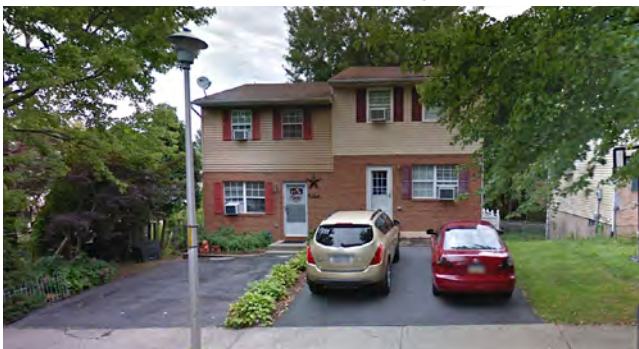
1940s Brick Twinhouse Development



Newer 1- and 2-story Twinhouses at Overlook Park



Suburban Twinhouses with Front Yard Parking



Pre-War Detached Houses

Detached houses built between 1880 and about 1945 include a wide variety of housing styles, such as Victorian, American Four-Square, Colonial, and Bungalow. These detached house types are often interspersed throughout the rowhouse neighborhoods, but are also often mixed into the post-war housing neighborhoods. Many of these houses are located along Allen Street in the **West End**. Larger estate-size versions exist along Hamilton in West Park, though several of these have been converted to commercial uses, e.g. offices and funeral homes.

Detached houses include yards on all sides of the building, though the yards may range in size significantly depending on the neighborhood or location of the lot.

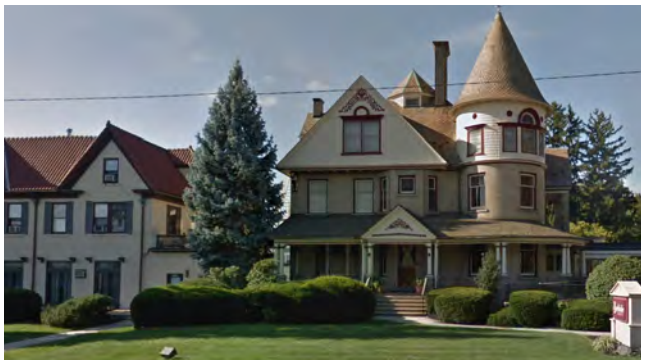
BUILDING CHARACTERISTICS

- Detached houses with yards on all sides of the building; lot sizes range from very small to estate-size.
- 2 to 2.5 stories ; bungalows are 1 to 1.5 stories
- Entrances on the street, transitioned through either a porch or a stoop, some enclosed porches
- Parking is located in the rear yard, off alleys or lanes in the central city area, with a side driveway in the southern, eastern, and western areas of the city.

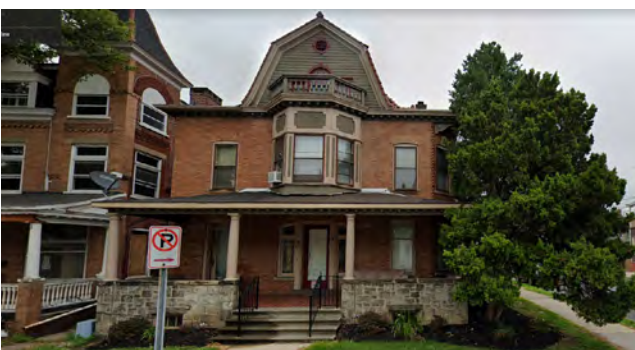
Typical Pre-War Detached Houses



Estate-Sized Pre-War Detached Houses (Converted to Office Uses)



Multi-Unit Pre-War Detached House



1.5-Story Pre-War Detached Houses (Bungalows)



Cottage Houses

Cottage houses were built beginning in the early 1930s until the mid-1950s, and are a ubiquitous housing type in the western, eastern, and southern neighborhoods of the city. Often these houses are mixed in with the mid-century houses. The Cape Cod is the primary example of this type.

The principle feature of this house type is a steeply pitched roof housing a half-story, making these houses 1.5 stories in height. Cottages with shallower roofs and no half story match features of and are categorized as mid-century houses.

BUILDING CHARACTERISTICS

- Detached houses with yards on all sides of the building; mid-sized lots
- 1.5 stories, most often with dormers; some 2 -story versions
- Entrances on the street, transitioned typically through a stoop
- Parking is located in the rear yard, off alleys or lanes in the central city area, with a side driveway in the southern, eastern, and western areas of the city. Some small garages on the fronts of buildings.

Typical Cottage Houses



Typical Cottages with Garages on Front Facade



Typical 2-Story Cottage



Typical 2-Story Cottage (Converted)



Mid-20th Century House

Built post WWII, this house type includes ranch-style houses, split-level houses, and 2-story versions of a ranch style. These are wide, horizontal houses, usually oriented lengthwise parallel to the street, on wider lots, usually greater than 60 feet and wider.

Story heights are often a low 7.5-8 feet, and roofs usually have a low pitch. These characteristics result in a lower overall height than pre-war houses and contemporary houses.

BUILDING CHARACTERISTICS

- Predominantly single story; 2-story versions and split-level versions included. No half stories.
- Deep front setbacks; large rear yards.
- Front facade garages, usually less than 30% of width except when in basement level.
- Low pitched roofs
- Windows and main entrance on front facade; windows often horizontally oriented
- Brick and lap siding

Typical Mid-20th Century Houses



Split-Level Mid-20th Century Houses



2-Story Mid-20th Century Houses



Suburban House

The Suburban House is a detached house on a mid- to large-sized lot, often with the garage or parking pad in front of the house. Not a common house type in Allentown, a few full neighborhoods of Suburban Houses have been developed and a some infill houses have been built in existing older neighborhoods.

The dominant facade material for these houses is lap siding, though houses on the estate-sized lots have brick facades.

Scale of these house types ranges from narrower versions on 50-foot lots to larger versions on lots over 120-feet in width.

Narrow-Lot Suburban Houses (approximately 50 - to 65-foot width)



Mid-Lot Suburban Houses (approximately 80- to 100-foot width)



Large-Lot Suburban Houses (approximately 100- to 140-foot width)



BUILDING CHARACTERISTICS

- 1.5- to 2-stories
- Deep front setbacks; large rear yards.
- Front facade garages, sometimes more than 50% of facade width, often double garages.
- Pitched roofs, often multi-gabled
- Windows and main entrance on front facade; windows often horizontally oriented
- Lap siding is a dominant material



Workshop-Warehouse

The Workshop-Warehouse building type is a multi-use building form originally developed for warehouse and industrial uses prior to the middle of the last century.

These largely brick buildings have wide openings to let in light, especially on multi-story versions original used for manufacturing. The facades of the buildings are typically solid, with very few openings except for vehicle bays. On older brick buildings windows are often blocked up.

Often located close to waterways, redevelopment of these buildings can provide an opportunity for public access to creeks and rivers.

BUILDING CHARACTERISTICS

- Brick buildings with lots of windows
- Ground stories may have loading bays or other less pedestrian-oriented structure
- Single- and multi-story, though single-story buildings have 16-foot and higher spaces
- Adaptive reuse options include housing (lofts), office, maker spaces, other manufacturing and service uses

Older Brick Workshop-Warehouse Buildings



Industrial Building

The Industrial building type applies to a very broad category of buildings and sites in Allentown. This type includes brick warehouse buildings, metal pole barns, and painted and unpainted block buildings. The facades of the buildings are typically solid, with very few openings except for vehicle bays.

Most sites include open outdoor storage of equipment, materials, and vehicles with fencing often lining the street lot lines.

These buildings house a wide variety of auto-oriented uses as well as warehousing storage, distribution, and manufacturing.

BUILDING CHARACTERISTICS

- Often includes outdoor storage of materials, vehicles, and equipment and the fencing surrounding it
- Metal and block buildings, sometimes associated with Workshop-Warehouse buildings
- Usually associated with truck traffic
- Focus on location of these necessary building types and minimizing visual and environmental impacts

Industrial Buildings



Civic Building

The Civic building type includes many civic and institutional building forms that do not fit a distinct mold. Churches, libraries, courthouses, and museums that do not meet the building type parameters for a General building fit into this category.

Typically, this detached building type includes yards surrounding the building to separate the structure from adjacent urban fabric. The location of parking is managed to ensure that these yards do not become parking lots. A high level of flexibility for roof types is required to allow for steeples, domes, and other unique roofs.

BUILDING CHARACTERISTICS

- Limited to civic and institutional uses, such as churches, mosques, temples, schools, libraries, museums, community centers, courthouses, park buildings, performing arts centers, theaters, transportation stations
- Includes landscaped yard and pedestrian areas surrounding the building
- Parking is located to the side or rear
- Wide variety of roof types and styles

Examples of Civic Buildings with Unique Characteristics



UNIQUE USES & BUILDING ADDITIONS

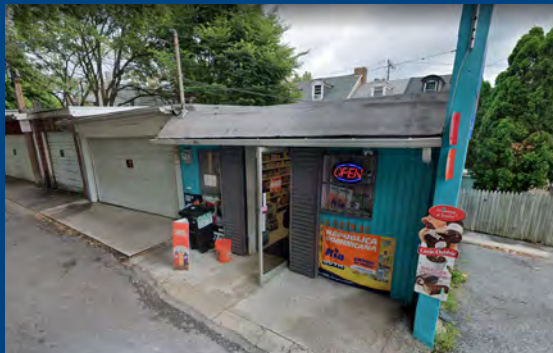
The following notes some potential topics for conversation related to both uses and building types. Some may already be addressed by the current code and will be carried forward in the new zoning regulations.

Given the new format of the code based upon building type, other physical additions may need further discussion to determine whether the outcome is positive or not.

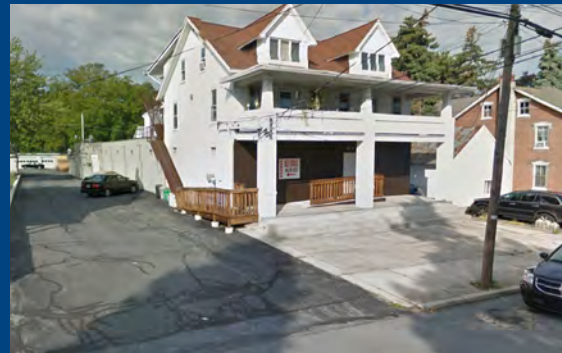
While expansion and flexibility may be warranted for home occupation uses in residential areas, the physical manifestation of these uses may also need additional flexibility. Further, some uses may be inappropriate in residential areas.

Where topography is steeper, the use of exposed or visible “basement” space for garages, additional units, or business space should be discussed.

Alley Convenience Store in Old Garage (across from park)



Self Storage Facility in House and Rear Building



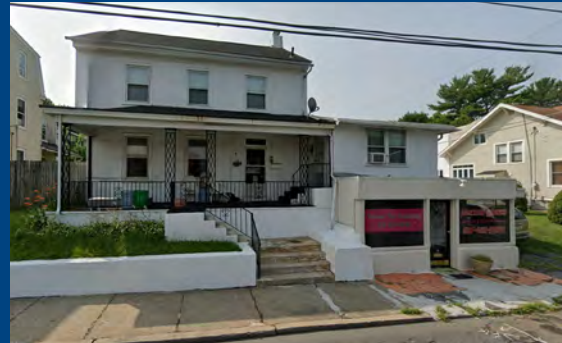
Accessory Units in Garage Buildings



Twinhouses with More Units (by College)



Commercial Additions to House Buildings



Proposed Zone Descriptions

The Proposed Zones by Building Type table on the following page provides a matrix of building types that currently occur within and generally define each proposed new zone. While the building types are well defined, this is a first look at proposed new zones and will likely be revised several times as we begin the process of drafting module 1 of the new code.

A brief description and special aspects of these proposed zones are noted as follows:

MX ZONES: VERTICAL MIXED-USE

The MX zones require a ground story storefront level with a mix of uses in the upper stories.

MX1: The downtown core is MX1 and focuses mainly on the Hamilton Street corridor, where storefront buildings occur continuously.

MX2: MX2 includes commercial corridors with storefront buildings, such as N 7th Street and the 19th Street Theater District, and nodes at Front Street, St John Street, and E Susquehanna Street.

MXN: The MXN zone is currently reserved for corner stores within neighborhoods, which may warrant limited uses. The MX2 zone, however, may be able to replace the MXN zone in these locations, depending on the final regulations.

MX3: MX3 is reserved for more suburban style commercial corridors, allowing the Commercial Center building type which accommodates more parking, drive-through facilities, and other more auto-focused uses (gas stations, auto servicing).

RX ZONES: RESIDENTIAL-OFFICE

The RX zones allow for a residential and office uses in the General building. These uses work well adjacently and the building forms for apartments and office buildings are very similar. Different scales of the General building are proposed to allow for the RX zones to apply to a range from the downtown out to suburban neighborhoods.

RX1: The downtown edge is RX1, located along Walnut, Linden, and Turner, and on the edges of Hamilton outside the core. The General building in this zone will allow for taller heights.

RX2: RX2 would apply to nodes of office and more intensive residential buildings around the fairgrounds and hospitals. More intensive apartment developments such as those on the westernmost edge of the city would also be zoned RX2.

RXN: The RXN zone would apply to small office and service buildings adjacent to neighborhoods, limiting the scale and more intrusive uses. This zone would also apply to office buildings located adjacent to the

MX3 zone in more suburban locations such as on Wyoming and Lehigh in the southern areas of the city.

N ZONES: NEIGHBORHOODS

The N zones are meant to be applied to mainly residential neighborhood areas.

N1 and N2: The N1 and N2 zones are currently defined to apply to the oldest rowhouse neighborhoods in the city, N1 applying where Urban Rowhouse (see building types descriptions) and N2 applying to where the Town Rowhouse is most common. These two types of rowhouses are distinctive; however, a discussion on the preservation of the scale of each neighborhoods will determine whether 2 zones are needed. Lane Rowhouses will be limited to specific locations (lanes).¹

N3: A mix of housing types were developed over the course of many decades in areas immediately adjacent to the rowhouse neighborhoods to the west, and in the southern and eastern parts of the city. The N3 allows twinhouses and a mix of detached houses consistent with the character of these areas, a large portion of the city.

N4 and N5: The N4 and N5 zones are intended to apply to mainly detached house neighborhoods, where the N4 is consistent with older neighborhoods in the West End. N5 is currently set to allow a wide mix of housing, likely a more conventional zone, including the suburban house type where a garage may dominate the front of the house. As mapping continues, additional zones may be needed with similar building types, based upon lot sizes and neighborhood needs.

CX: HEAVY COMMERCIAL MIX

The CX zone is currently defined to accommodate a wide mix of more intensive uses, not as compatible with residential, shopping, and office uses. Allowing the more industrial building forms, these locations should not be located on gateway corridors into the city. Currently, these are meant to address areas on the edges of the city that abut neighborhoods, areas adjacent to the airport, and streets such as Sumner Avenue and Fenwick.

I: INDUSTRIAL AND P: PUBLIC-INSTITUTIONAL

The industrial and institutional areas are mapped based on where those uses currently occur. Institutional is noted separately as its building form is unique and the uses occur throughout the city. A P1 and P2 zones will be mapped to differentiate between open space (P1) and institutional and civic buildings (P2). We may also recommend a P3 zone to apply to institutional campuses, such as hospitals and the college.

1 Discuss Lane Rowhouses specifically.

Proposed Zones by Building Type Table

	PROPOSED ZONES														
	STOREFRONT				RES-OFFICE			NEIGHBORHOOD					OTHER		
	MX1: Downtown MU	MX2: MU Corridors	MX3: Suburban Corridor	MXN: Neighborhood MU	RX1: Downtown R-O	RX2: Residential-Office	RXN: Neighborhood R-O	N1: Row Neighborhood	N2: Row Neighborhood	N3: Twin-House Nbrhood	N4: Detached Nbrhood	N5: Suburban Nbrhood	CX: Commercial Mix	I: Industrial	P: Public & Institutional
MIXED-USE & COMMERCIAL BUILDING TYPES															
Storefront	●	●	●	●											
Commercial House			●	●		●	●								
Commercial Center			●												
Downtown General Building					●										
Small General Building (Res)						●	●	○	○	●					
Small General Building (Ofc)						●	●	○	○	○					
Suburban General Building ¹															
NEIGHBORHOOD BUILDING TYPES															
Urban Rowhouse								●							
Town Rowhouse									●						
Lane Rowhouse								●	●						
Suburban Rowhouse ²															
Town Twinhouse										●					
Suburban Twinhouse ³															
Pre-War House										●	●	●			
Cottage House										●	●	●			
Mid-20th Century House												●			
Suburban House												●			
OTHER BUILDING TYPES															
Workshop-Warehouse						●	●						●	●	
Industrial Building													●	●	
Civic Building		●	●	●	●	●	●	●	●	●	●	●	●	●	●

KEY: ● = Allowed in Zone ○ = Single Building, Only on Corners in Zone

- 1 Building type to be folded into the General Building
- 2 Building type to be folded into the Town Rowhouse regulations
- 3 Building type to be folded into the Town Twinhouse regulations

Defining Residential Areas

In order to preserve character of an area where we anticipate less change, it is important to understand the elements that define the general character of the neighborhoods and districts. This process is based mainly upon the physical character of the neighborhood, to ensure that infill development (new development within the area) matches or works well within the character area.

The building types are defined generally based upon the following:

BUILDING FORM & ERA

Building form is how we understand the different neighborhoods and districts within the city. Every city has a different set of dominant building forms, establishing its own unique character.

The following pages document the building forms dominant in Allentown's neighborhoods. Building forms are based upon the scale and key attributes of typical buildings, not necessarily the styles. Multiple styles may be represented by one building form; consequently, if the building form is coded with key characteristics, multiple styles are possible.

The building forms are defined based upon multiple attributes, such as the scale of the building envelope and the lot, key facade elements, and the location of garage entrances.

BUILDING ENVELOPE AND LOT

The width of the building, the width of the lot, and the orientation of the building on the lot are considered. These attributes also establish how much space surrounds the buildings, a key determination in the character of the neighborhood. These characteristics along with building height also establish the relative scale of the buildings between different areas and neighborhoods. For example, houses that are oriented horizontally along the street on wider lots create a different "street feel" than narrow houses oriented perpendicular to the street on a narrow lot with small side yards.

Roof pitches also contribute to the scale of building forms, with steep roofs on single story buildings allowing for attic spaces and a more substantial building than lower pitches. Conversely, where a third story is located under a pitched roof, the building feels significantly smaller in scale than a full third story with a flat roof.

For multiple-family developments, the same criteria is considered, with particular attention to the orientation of the buildings to the street. Many

apartment buildings and rowhouse developments built post 1950 are organized around parking lots as opposed to along the street. This creates a distinctive feel to these areas in contrast to buildings that follow the block layout and building orientation of the adjacent neighborhoods.

KEY FACADE ELEMENTS AND GARAGE ENTRANCES

The location of garage entrances, front doors, and windows on the street facade also provides definition of different building forms. A series of garage doors dominating the facades of houses along a more recently developed street contrasts with houses where the garage is located in the rear of the lot and the facade is dominated by a porch with the front door and windows facing the street on each story.

The year the building was constructed often defines many of these characteristics. For example, pre-World War II houses tended to be built larger on smaller lots with narrower side setbacks to create as much density as possible. Post-World War II and later homes often include garages on the front facades and deeper, wider yard areas, especially those constructed in the latter part of the last century.

LAND USE

For residential areas, land use typically refers to the number of units in the building. In many ways, the building form is more important, in terms of the character of an area, than the number of units. However, the number of units in a building contributes to the scale and other characteristics of the building form.

For the residential neighborhoods, the focus is mainly on whether or not the neighborhood is primarily single-family (or appears single family from the street) or contains multiple units, visible from the street. For example, cottages are typically single-family due to their scale and history; whereas other house types work well as single- or multiple families with little difference in design.

Whether or not buildings accommodating 5 or more households are present in a neighborhood contributes to the character of the neighborhood. Smaller multiple-family buildings (e.g. six packs, six units with 3 stacked on either side of an entry hall) were historically incorporated throughout some neighborhoods. Larger multifamily buildings were often clustered together or located along

transportation corridors. More recently, larger multi-family developments have been developed on large-scale blocks in pods or clusters, loosely organized around parking lots. Therefore, the location and layout of larger multiple-family apartment and rowhouse building forms is considered in the definition of the character for an area.

Finally, the presence of commercial or mixed-use buildings located on corners within a neighborhood is also a consideration in defining the character type, though these have been mapped separately to show their occurrence.

STREET CHARACTERISTICS

The character of any neighborhood is largely based upon the types of houses and key attributes of their street-facing facades. Another element considered is the street design, especially the pedestrian components. Allentown has multiple “streets” with rights-of-way less than 30 feet in width and Urban Rowhouses fronting them. These narrow streets are referred to throughout this document as “alleys or lanes”. As mapping continues, lanes will be mapped on those streets that have some level of sidewalk and could be converted to nicer frontages for residential homes. Alleys will be mapped as those streets with no pedestrian way and fewer houses fronting them.

Defining Mixed-Use/Commercial Areas

The term “mixed-use” is used here to refer to character areas along commercial corridors and in the downtown, as well as other neighborhood-scale commercial nodes. Generally, these areas include shopping and service locations, office buildings, and other heavier commercial uses that are not categorized as industrial uses. The building types further define the character areas.

Mixed-use and commercial character areas are defined generally based upon the following:

BUILDING TYPES

Similar to residential forms, mixed-use and commercial building types are key to defining the different nodes and districts along corridors and in the downtown.

While the main-street-style storefront building is a typical American building type, the mix of other building types (e.g. converted Urban Rowhouses) within the area make Allentown’s commercial corridors distinctive. Building forms in mixed-use

and commercial areas are based upon the scale and how the buildings relate to and engage with the sidewalk and the street.

The building types are defined based upon multiple attributes, especially the building and parking siting, building scale, and key facade elements.

BUILDING AND PARKING SITING

The location of the building on the lot, in relation to the front property line and the sidewalk is directly related to the era of the building. Pre-war shops, offices, and storefronts were developed for people walking down the commercial corridor, “main street”. These buildings are located at the front of the lot with little or no parking, and loading and service in the rear of the building. Buildings were built close to each other to create a continuous “streetwall” with little or no side yards.

Buildings built post-World War II, with the ascendance of the automobile, include larger parking lots in the front with building set back from the sidewalk, as most people are assumed to arrive by car. Strip shopping centers, gas stations, and larger, regional-serving stores (larger grocery stores) are examples of this era of building form.

Many buildings in Allentown’s landscape have also changed use over time. Houses have been converted to offices, small storefronts have been added to houses and apartment buildings to create more variety along corridors and at commercial nodes. The scale of these smaller buildings fit well with the pre-war storefronts in the commercial areas and create neighborhood nodes appropriate in scale to the adjacent houses.

In some locations, the conversion of houses to office uses has been coupled with investments in the buildings, preserving the buildings and maintaining the historic elements. In other locations, additions have not been in keeping with the original quality of the structures, lowering the value of the buildings within the neighborhoods. When defining the new districts and mapping areas, consideration should be given to the quality of the conversions.

Roof types also influence the character of the area. Flat roofs on mixed-use and commercial buildings allow these buildings to be taller without adding the height of a roof pitch. These flat roofs usually have parapets and other design features to mark the top of the building, keeping the building in scale with the pedestrian. Pitched roofs tend to occur mainly

on commercial buildings that were converted from houses.

KEY FACADE ELEMENTS

The location of the building entrance and the amount of glass (windows) on the ground floor are important attributes to note on mixed-use and commercial buildings. Buildings constructed for retail and services tend to have larger storefront windows and those built for office uses tend to have smaller windows on the ground story. However, buildings without windows on the “public” facades tend to be less friendly and create barriers to activity. In many cases, windows have been either reduced in size or blocked up completely, creating a vacant look and reducing the appeal of the area. While this trait is ignored in the definition of the character areas, the previous existence of storefront windows is given the same designation as current storefront windows.

LAND USE

In general, areas that appear to have commercial uses and are currently designated as commercial in the land use information from the tax assessor’s office were included in the mixed-use/commercial character areas. Whether or not these areas are all zoned for mixed-use or commercial is a topic for discussion during the drafting process.

Three general categories of uses were considered in the definition of character areas (with the building types following suit):

- active shopping and service (e.g. restaurants, personal care) areas
- office uses (sometimes mixed with residential or residential types of uses)
- heavier commercial uses, meaning more of a focus on either automobile traffic or use (e.g. gas stations, big box retail, grocery stores)

Light industrial or contractor oriented uses have been separated as a different character type. (These uses may also occur where the industrial building type is mapped.)

Street Characteristics

Street design, especially the pedestrian components, plays an integral role in the definition of mixed-use and commercial character areas. In conjunction with the building orientation and facade design, a wider sidewalk abutting the building is typical of main-street style commercial.

Streets without pedestrian accommodations tend to be along larger transportation corridors and coincide with post-war development that is more automobile oriented.

Coincident with the building eras, streets with pedestrian accommodations are typically located in areas with a smaller-scale, interconnected block pattern, making access to these commercial uses from the neighborhoods easier. Locations with a less robust pedestrian realm are often located in areas with larger blocks and less connectivity. .

Other Areas

Industrial, park, and institutional districts are mapped based on their current building type, often consistent with their use.

INDUSTRIAL

Industrial uses tend to have a significant amount of outdoor storage of equipment and materials as well as truck parking and access. Buildings tend to be fairly simple, with few windows and often constructed of cost efficient materials. In some cases, old brick warehouse buildings are still used for industrial uses, but many of these are transitioning to other uses, such as office and residential.

INSTITUTIONAL, INFRASTRUCTURE, PARK USES

Institutional uses in Allentown often occur in high quality buildings, many of which are historic in character. For the purposes of the building type study and because of the abundance of institutional uses in the city, these are mapped where they occur with the assumption of little change. A new distinct zoning district, as noted in previous sections, will map these separately.

Parks and infrastructure (utility) parcels are also mapped as is, with the assumption of no change. Future parks will be considered in new development on larger parcels.