



ULDC REVISIONS STAFF REPORT

ZC PHASE 1 (INITIATION), JUNE 5, 2025

I. General Data

Project Name:	Townhouse Regulations - Privately Proposed Revision Phase 1
Articles:	3 and 11
Project Manager:	Alexander Biray, Senior Site Planner
Agency Manager:	Lisa Amara, Zoning Director
Staff Recommendation:	Staff recommends <i>approval of Phase 1 and initiation of Phase 2</i> based on the findings and conclusions presented in this report.

II. Item Summary

Summary:	The item before the Board is a Privately Proposed Revision (PPR) to the Unified Land Development Code (ULDC) to modify Property Development Regulations for Townhouses to reduce setbacks, clarify separation distances, and to re-introduce parking tracts.
Assessment:	The purpose of these revisions to the ULDC is to add flexibility for Townhouse developments. The County has not modified property development regulations (PDR)s for Townhouses for many years, and these regulations are outdated and cumbersome for applicants in comparison to Multifamily PDRs. Further, due to the elimination of ‘parking tracts’ in 2014, the PDRs for Townhouses are more restrictive than Multifamily uses, and many of the existing Townhouse communities have been rendered non-conforming. Staff supports the initiation of the Applicant’s request, and additional PDR revisions including the return of ‘parking tracts’ for Townhouses.
Phase 1:	This item is being presented as Phase 1, in which staff provide preliminary analysis and staff recommendation on whether the proposed ULDC revisions should be approved for initiation. If the BCC approves Phase 1, the applicable implementing department (in this case the Zoning Division) and the applicant will coordinate for a more detailed analysis in Phase 2. The initiation of the proposed items does not imply that these ULDC revisions will be approved in the future. Rather, the initiation authorizes staff to proceed with further review and to prepare a staff report with data and analysis for Board consideration for adoption. If Phase 1 is approved, the Zoning Division will present the Phase 2 Report to the ZC and BCC at public hearings later in the year.

II. Hearing History

ZC Initiation Recommendation:	<i>Scheduled for June 5, 2025</i>
Board of County Commissioners Initiation:	<i>Scheduled for June 18, 2025</i>
ZC Recommendation:	<i>Not yet scheduled</i>
LDRC Determination:	<i>Not yet scheduled</i>
Board of County Commissioners Permission to Advertise:	<i>Not yet scheduled</i>
Board of County Commissioners Adoption:	<i>Not yet scheduled</i>

IV. Intent

The item before the Board is a Privately Proposed Revision (PPR) to the Unified Land Development Code (ULDC) to modify Property Development Regulations for Townhouses to reduce setbacks, clarify separation distances, and to re-introduce parking tracts.

Phase 1 vs. Phase 2. This item is being presented as Phase 1, in which staff provide preliminary analysis and staff recommendation on whether the proposed ULDC revisions should be approved for initiation. If the BCC approves Phase 1, the applicable implementing department (in this case the Zoning Division) and the applicant will coordinate for a more detailed analysis in Phase 2.

V. Data and Analysis

This section provides a summary of the Applicant's site prompting the request, an analysis of the Standards of Review, and the Consistency with the Comprehensive Plan.

A. Proposed Revisions

Unincorporated Palm Beach County has a diminishing amount of land in the Urban Suburban Tier available for residential development, and properties available for development are coming in on smaller sizes. The Townhouse style of housing is becoming increasingly popular. Due to the restrictive nature of the current ULDC Townhouse property development regulations (PDRs), many applicants are seeking this style of housing by using the Multifamily housing type which is less restrictive. However, many builders and home buyers find fee-simple ownership through Townhouses more desirable than Multifamily condominiums.

The Applicant has requested a reduction in the rear setback for Townhouses from 25 feet to 15 feet. Staff proposes the addition of additional reduced setbacks and the return of parking tracts for Townhouses to Art. 11.

B. Applicant's Justification and Standards for Review

Pursuant to ULDC Article 2.D.3, when considering an application for a PPR to the ULDC, the following standards shall be considered. Each item is provided below with Staff Analysis. Exhibit 2 provides the Applicant's Justification Statement with full Applicant's response for each item.

1. A finding that the proposed ULDC revision does not violate State, Federal, or other local government laws;

Staff Analysis: Staff concurs with the Applicant's assessment that the proposed ULDC amendments do not violate any State, Federal, or other local government laws. The Setback PDR revisions will allow for more flexibility in development and ensure the efficient use of land.

2. A preliminary analysis demonstrating consistency with the Plan;

Staff Analysis: A preliminary review indicates that there are no inconsistencies identified with the Comprehensive Plan. As detailed in the Applicant's Justification Statement, the Setback PDR will provide for more efficient use of land by reducing the townhouse rear setback to a minimum that is consistent with the rear setback requirements for all other types of residential housing. This will provide for more compact townhouse development, thus reducing urban sprawl and promoting appropriate land distribution and arrangement.

3. An analysis and finding of internal consistency within the ULDC, with the identification of any other ULDC revisions that may be necessary to ensure internal consistency;

Staff Analysis: A preliminary review indicates that the proposed revision is not in conflict with any other provisions of the ULDC. As detailed in the Applicant's Justification Statement, the County has established separate townhouse regulations for TND, Traditional Neighborhood Development, which requires a minimum rear setback of 15 feet, consistent with the setback proposed. The existing inconsistency of the minimum rear setback, results in inefficient use of land for townhouse development. The proposed

revisions will ensure consistency moving forward and does not require additional ULDC revisions to ensure internal consistency.

4. **A preliminary identification of properties that may be affected by the proposed ULDC revisions;**

Staff Analysis: This proposed ULDC Revision would reduce setbacks for Townhouse developments to be more in line with those for Multifamily. These regulations would apply to any new application seeking this use, and previously approved projects. The Applicant’s Justification Statement details the zoning districts that allow the Townhouse use.

5. **An evaluation of the availability of other alternatives to the proposed ULDC revisions, and if other alternatives are available, a demonstration of why those alternatives are not being pursued and;**

Staff Analysis: The Applicant and the Zoning Division have met on several occasions to discuss options related to Townhouse development. Reducing the Townhouse PDRs is a timely undertaking considering the need for housing in the County. There is no other alternative available other than a variance which is not the appropriate technique to address outdated development regulations.

6. **Staff recommendation on whether the proposed ULDC revisions should be initiated, initiated with modifications, or denied.**

Staff Analysis: Staff recommends the initiation of Phase 1 and more revisions than the applicant has proposed. Staff supports the reduction in the rear setback from 25 feet to 15 feet as proposed by the Applicant, and proposes additional revisions to: reduce the side street setback, revise separation distance revisions for clarity, and eliminate the greater setbacks for Townhouses over 25 feet in height. The language proposed may be further modified during Phase 2 to incorporate the addition of parking tract language that was in the ULDC through 2014.

E. **Consistency with the Comprehensive Plan**

A preliminary review indicates that there are no inconsistencies identified with the Comprehensive Plan. The Planning Division will analyze the proposed revision in greater detail through Phase 2.

VII. Assessment and Conclusions

As demonstrated in this report, the Privately Proposed Revision (PPR) to the ULDC warrants consideration through the approval of Phase 1. Pursuing revisions to setbacks and related regulations for Townhouse development is timely and appropriate considering the need for housing and diminishing land in the County. The County has not modified property development regulations (PDR)s for Townhouses for many years, and these regulations are outdated and cumbersome for applicants in comparison to Multifamily PDRs. Further, due to the elimination of ‘parking tracts’ in 2014, the PDRs for Townhouses are more restrictive than Multifamily uses, and many of the existing Townhouse communities have been rendered non-conforming. Staff supports the initiation of this request, and will work with the applicant to add additional related changes as needed in Phase 2.

The Phase 1 stage is to authorize Phase 2 for a comprehensive analysis. The initiation of the proposed items does not imply that these ULDC revisions will be approved in the future. Rather, the initiation authorizes staff to proceed with further review and to prepare a staff report with data and analysis for Board consideration for adoption. The Zoning Division will present the Phase 2 Report to the ZC and BCC at public hearings later in the year. Staff recommends approval of Phase 1.

Attachments

Exhibit 1 - Proposed changes in strike out and underline format	E-1
Exhibit 2 - Applicant’s Justification Statement	E-2

EXHIBIT 1
TOWNHOUSE

This exhibit revises the following Article(s):

ARTICLE 3 – OVERLAYS AND ZONING DISTRICTS
ARTICLE 11 – SUBDIVISION, PLATTING, AND REQUIRED IMPROVEMENTS

Revision Key: Proposed revisions are shown with new text as underlined, deleted text in strike-out, and relocated text italicized. ~~Stricken and italicized~~ means text to be totally or partially relocated. Relocation notes are shown in brackets as [Relocated to:] or [Relocated from:]. Unaltered text omitted for brevity is indicated by a series of four bolded ellipses....

Part 1. ULDC Art. 3.D.1.A, OVERLAYS AND ZONING DISTRICTS, PROPERTY DEVELOPMENT REGULATIONS (PDRs), is hereby amended as follows:

CHAPTER D PROPERTY DEVELOPMENT REGULATIONS

Section 2 PDRs for Specific Housing Types

A. Townhouse

The minimum lot dimensions, maximum height, maximum FAR, maximum building coverage, and minimum setbacks and separations for Townhouses in all districts where they are permitted shall be as follows:

...

Table 3.D.2.A – Townhouse Property Development Regulations

Lot Dimensions			Max. Height	Building Coverage	Setbacks and Separations (1)(2)					
Size	Width and Frontage	Depth			Front		Side		Side Street	Rear
					Height < 25'	Height 25-35'	Height < 25'	Height 25-35'		
800 sq. ft.	16'	50'	35'	100% of buildable area	15' – Unit 15' – No garage. Side loading garage, or parking tract 25' – Front loading garage	20' – Unit 30' – Front loading garage 20' – Side loading garage or parking tract	0' – Interior unit 7.5-15' – End unit	0' – Interior unit 25' – End unit	25' – End unit	25' 15'
Notes:										
1.	Front and side street setbacks measured from street or parking tract. Side and rear setbacks measured from plat, parcel, or pod boundary; lake maintenance easement, canal easement, or canal R-O-W; or, required landscape buffer. [Ord. 2005-002]									
2.	The separation distance between Separations apply to the proximity of one Townhouse group to another <u>shall be a minimum of 15 feet.</u> Separation between two Townhouse buildings shall be by drawing a centerline between the two adjacent buildings and measuring a minimum distance equal to one-half of the required separation from the centerline to ensure an equidistant separation between structures. For the purpose of this Section, a Townhouse building shall mean two or more attached Townhouses.									
3.	Recreation buildings and other structures which are not accessory structures shall comply with the setback requirements in this Section.									

...

Part 2. ULDC Art. 11.E.2.A.2, Subdivision, Platting, and Required Improvements, Required Improvements, Access and Circulation Systems, Vehicular Circulation Systems, Minimum Legal Access Requirement, is hereby amended as follows:

Article 11.E.2.A.2.d

2. Minimum Legal Access Requirement

There is hereby established a hierarchy of legal access as shown on Table 11.E.2.A, Chart of Access Hierarchy. Except as provided below, each lot shall abut a street of suitable classification to provide said lot with legal access consistent with the standards set forth in Table 11.E.2.A, Chart of Minor Streets.

....

d. Townhouses may utilize a common parking lot for legal access. The common parking lot shall be dimensioned and depicted on the construction plans and reserved on the plat as a "parking tract." Said tract shall be reserved for parking and access purposes to the Property Owners' Association having jurisdiction over the parking area and the abutting lots.

EXHIBIT 2

APPLICANT'S JUSTIFICATION STATEMENT



BONNIE MISKEL • SCOTT BACKMAN • ERIC COFFMAN • HOPE CALHOUN
DWAYNE DICKERSON • ELE ZACHARIADES • CHRISTINA BILENKI
DAVID MILLEDGE • SARA THOMPSON • JEFFREY SCHNEIDER • SAMUEL EPSTEIN

Townhome ULDC Revisions Statement of Use and Justification for a Privately Proposed Revision to the Unified Land Development Code Submitted: April 1, 2025

Mattamy Homes Palm Beach LLC ("Petitioner") is the owner of the +/- 90 acre Forest Oaks Residential development ("Property"), which is a portion of the +/- 273.50 acre Lucerne Lakes Planned Unit Development ("PUD") that is generally located at the southwest corner of Lake Worth Road and Charleston Street in unincorporated Palm Beach County ("County"). The Property is located approximately ¾ miles east of the Florida Turnpike on the south side of Lake Worth Road. The Property is located within the County's Urban/Suburban Tier, designated HR-12, High Residential – 12 unit per acre, on the County's Future Land Use Atlas ("FLUA"), and located within the RM, Multifamily Residential, zoning district with a Special Exception for a PUD.

On December 10, 1970, the Board of County Commissioners approved the 273.5 acre Lucerne Lakes PUD as a Special Exception for a Planned Unit Development (PUD) on December 10, 1970 to allow a planned residential development with 3,395 dwelling units under Control Number 1970-0009 / NPN-009. On October 28, 2021, the BCC approved Resolution R-2021-1597 allowing a Development Order Amendment to replace the golf course shown on the original 1970 master plan with residential use including 450 residential units including 350 fee simple townhomes and 100 fee simple zero lot line ("ZLL") single family homes. On September 2, 2022, the County's Development Review Officer ("DRO") granted Final Master Plan approval (Off the Board) with the necessary landscape buffer revisions to address the BCC conditions of approval memorialized by the Board action on October 28th via Resolution R-2021-1597.

As detailed above, Petitioner has obtained all required land use and zoning approvals to develop the Property with 450 units, including 350 townhouses and 100 ZLL single family homes, and has been working through the County's permitting processes to commence development and bring these much needed homes to the market. At this time, Petitioner has obtained permits for development of a significant portion of the proposed residential community; however, a setback issue with a new unit type designed to provide a cantilevered second story facade arose during the permitting process. While County staff worked closely and collaboratively with Petitioner to resolve the issue on many lots within the community, this issue called attention to disparities within the County's setback regulations.

More specifically, the County's Unified Land Development Code ("ULDC") requires a 25 foot rear setback for all townhomes and further requires that setbacks for townhome units be measured from the interior edge of a landscape buffer when within a planned development thus effectively requiring a 33 foot to 45 foot setback from adjacent properties or rights-of-way (when accounting for a landscape buffer width ranging from 8 feet to 20 feet). Conversely, the ULDC requires only

a 15 foot rear setback for projects with standard RS zoning (such as single family homes) or RM zoning (such as congregate living facilities (“CLF”), multifamily (“MF”), and single family home), which do not require a separate landscape buffer tract and are therefore measured from either a shared property line or right-of-way line. Further, ZLL unit types require only a 10 foot rear setback, 15 feet less than a townhome unit, although a townhome is traditionally intended to be a more compact housing type and should therefore have a lesser setback requirement. The ULDC further exempts CLF and MF development, both of which are typically higher intensity uses, within a planned development from measuring setbacks from the interior edge of a landscape buffer, thereby maintaining the minimum 15 foot rear setback requirement established within standard zoning regulations for these higher intensity uses. The inconsistency of the minimum rear setback required for a townhome unit versus those required for every other type of unit in the County, whether more intense or less intense, results in extremely inefficient use of land for townhome development.

Land values in the County have surged since the Coronavirus pandemic in 2020, thus exacerbating an already existing housing crisis whereby the cost of housing exceeds an amount that is attainable for a large portion of the community. As such, it is more important than ever to ensure that the zoning regulations that guide development in the County allow for the efficient use of land while also safeguarding the quality of life for current residents through appropriate transitions between land uses. As detailed above, the current ULDC provisions related to townhome development do not prioritize the efficient use of land, recognize that the townhome product type is by its nature intended to be a more compact and transitional housing type than traditional single family or even ZLL single family homes, or distinguish that townhome development is lesser intensity than CLF or MF development and thereby should not be subject to greater setbacks than those required for any other type of residential development. This fracture in the ULDC requires repair in order to ensure that well planned townhome development can be delivered to the market in the most efficient way possible.

PROPOSED ULDC PRIVATELY PROPOSED REVISION

In consideration of the factors noted above, Petitioner respectfully requests approval for a Privately Proposed Revision (“PPR”) to the ULDC to amend Table 3.D.2.A 3, Townhouse Property Development Regulations, to provide a 15 foot rear setback in lieu of the 25 foot rear setback currently required (“Setback PPR”), as shown in the strikethrough/underline.

PPR STANDARDS

In accordance with ULDC Section 2.D.5.B.1, Petitioner will demonstrate below that the Setback PPR: (a) does not violate State, Federal, or other Local Government laws; (b) is consistent with the Comprehensive Plan; (c) is consistent within the ULDC and no other ULDC revisions are necessary to ensure internal consistency; (d) affects all residentially zoned property that allows townhome development; and (e) is the best alternative to the current ULDC provisions.

A. THE SETBACK PPR DOES NOT VIOLATE STATE, FEDERAL, OR OTHER LOCAL GOVERNMENT LAWS.

The Setback PPR does not violate State, Federal, or other local government laws. The federal government provided the foundation for local governments to adopt and enforce zoning regulations through the Standard State Zoning Enabling Act in 1926. The State of Florida

subsequently adopted the Florida General Zoning Statute in 1939, thereby creating general enabling authority to municipalities to enact comprehensive zoning codes. In 1955, the State of Florida enacted legislation through Chapter 31119, House Bill No. 205, Laws of Florida, Special Acts of 1955, specifically authorizing and empowering the BCC to control the development of the County through planning, zoning, subdivision regulations, etc. In 1957, the County adopted Zoning Resolution No. 3-57 establishing zoning within the unincorporated areas of the County. The County's zoning regulations have been amended a number of times, resulting in the adoption of today's ULDC through Ordinances 2003-067, 2003-068, and 2003-074, as amended (Supplement 32). ULDC Section 2.D specifically allows for a privately proposed revision to the ULDC through the process established in the ULDC. The Setback PPR is proposed in accordance with the requirements of ULDC Section 2.D.

Further, the Setback PPR complies with *Florida Statute 163.3202, Land development regulations*, as follows:

F.S 163.3202(1) *...each county and each municipality shall adopt or amend and enforce land development regulations that are consistent with and implement their adopted comprehensive plan."*

F.S 163.3202(1) *Local land development regulations shall contain specific and detailed provisions necessary or desirable to implement the adopted comprehensive plan and shall at a minimum:*

(a) Regulate the subdivision of land.

The Setback PPR is within the County's zoning powers and does not impact ULDC subdivision regulations. The Setback PPR will only allow for more flexibility in development and ensure the efficient use of one of the County's most limited resources – land. Considering the foregoing, the Setback PPR does not violate federal, state, or other local government laws.

B. THE SETBACK PPR IS CONSISTENT WITH THE COMPREHENSIVE PLAN.

The Setback PPR is consistent with the Comprehensive Plan and furthers the County's long range planning goals. The County's Comprehensive Plan establishes that a component of the intent and purpose of the Future Land Use Element as a whole is "to ensure development and maintenance of sustainable communities through smart growth practices which...prevent urban sprawl to encourage efficient use of land, facilities and services; [and] provide for appropriate land use distribution and arrangement..." The Setback PPR will provide for more efficient use of land by reducing the townhome rear setback to a minimum that is consistent with the rear setback requirements for all other types of residential housing. This will provide for more compact townhome development, thus reducing urban sprawl and promoting appropriate land distribution and arrangement.

The Setback PPR promotes several of the County Directions detailed in the Future Land Use Element, as follows:

- **Livable Communities.** The Setback PPR will ensure the creation of livable communities by limiting the land required for a single dwelling unit, thus allowing land to remain available for organized open space and other uses.
- **Growth Management.** The Setback PPR will provide for sustainable communities and lifestyle choices by preventing urban sprawl and providing for the efficient use of land through more compact urban/suburban property development regulations.
- **Infill, Redevelopment and Revitalization.** The Setback PPR will encourage revitalization, redevelopment, and infill development in urban areas by making possible efficient use of land in townhome development.
- **Land Use Compatibility.** The Setback PPR will provide rational land development regulations to help ensure that appropriate transitional spacing is provided to ensure compatibility of the densities and intensities of land uses by establishing a setback requirement for townhomes that is consistent with the setback requirement established for single family, ZLL, MF, and CLF unit types.
- **Neighborhood Integrity.** The Setback PPR will respect the integrity of neighborhoods, including their geographic boundaries and social fabric by establishing a setback requirement for townhomes that is consistent with the setback requirement established for single family, ZLL, MF, and CLF unit types.
- **Housing Opportunity.** The Setback PPR will ensure that housing opportunities are compatible with the County's economic opportunities ensuring the efficient use of land.
- **Design.** The Setback PPR will promote the concept of design to direct development by establishing a more flexible rear setback for townhome development, thus ensuring that such development is functional, orderly, efficient, visually pleasing, environmentally sound, economically viable and supportive of generally accepted community goals.

Considering the foregoing, the Setback PPR is consistent with the County's Comprehensive Plan.

C. THE SETBACK PPR IS CONSISTENT WITHIN THE ULDC AND NO OTHER ULDC REVISIONS ARE NECESSARY TO ENSURE INTERNAL CONSISTENCY.

The Setback PPR is consistent within the ULDC and no other ULDC revisions are necessary to ensure internal consistency. The Setback PPR is limited to reducing the minimum townhome setback from 25 feet to 15 feet. The proposed 15 foot rear setback for townhome units is consistent with the setback requirements for all other residential housing types within the County, which are detailed below for reference:

- | | |
|---|---|
| • RS Zoning (such as single family homes) | 15 foot rear setback |
| • RM Zoning (such as CLF, MF, and SFR) | 15 foot rear setback |
| • ZLL Units | 10 foot rear setback |
| • MF and CLF in PDD | 15 foot rear setback (measured from the perimeter of the planned development rather than interior edge of buffer as is required for a townhouse unit) |

Further, the County has established separate townhome regulations for TND, Traditional Neighborhood Development, which requires a minimum rear setback of 15 feet, consistent with the setback proposed in the Setback PPR. The existing inconsistency of the minimum rear setback required for a PUD townhome unit versus those required for every other type of unit in the County, whether more intense or less intense, results in inefficient use of land for townhome development. The proposed Setback PPR will ensure consistency moving forward and does not require additional ULDC revisions to ensure internal consistency.

D. THE SETBACK PPR AFFECTS ALL RESIDENTIALLY ZONED PROPERTY THAT ALLOWS TOWNHOUSE DEVELOPMENT IN THE COUNTY.

The Setback PPR affects all property that allows townhouse development in the County. Article 4 of the ULDC establishes that townhouse development is permitted by right within the following areas of the County:

- Residential Pod of a PUD,
- Residential Pod of a TND located within the Urban/Suburban Tier,
- TMD, Traditional Marketplace Development, located in the Urban/Suburban, Exurban, and Rural Tiers, and
- TMD Development Area within the Agricultural Reserve.

Article 4 of the ULDC further establishes that townhouse development is permitted subject to DRO approval within the following areas of the County:

- RM zoning district,
- Urban Redevelopment Area (all sub-areas),
- Infill Redevelopment Area (all sub-areas), and
- MUPD, Multiple Use Planned Development, zoning districts with a Commercial Low, Commercial High, or Commercial High Office FLUA designation.

Lastly, Article 4 of the ULDC establishes that townhouse development is permitted subject to Class A Conditional Use approval within the following areas of the County:

- RS zoning district,
- Residential Pod of a TND located within the Exurban and Rural Tiers.

As such, the Setback PPR may affect the properties located within these districts.

E. AN EVALUATION OF ALTERNATIVES TO THE SETBACK PPR ILLUSTRATES THAT THE SETBACK PPR IS THE BEST ALTERNATIVE TO THE CURRENT ULDC PROVISIONS.

Petitioner evaluated alternatives to the Setback PPR to address the minimum setback inconsistency issue and identified one additional option, which is to modify ULDC Section 3.E.2.D. to include townhouse development in a PUD in the exception from measurement of building setbacks from the inside edge of the perimeter landscape buffers, thus allowing setback measurement from the perimeter of the PUD instead. However, that alternative does not address the inconsistency in the rear setback requirement within standard districts. Rather, it only addresses the inconsistency within planned development districts. As such, the Setback PPR provides the best option to address this issue.

That said, given that the alternative measurement required for PUD development results in a significantly greater setback than the measurement that applies to standard zoning districts practically speaking, there does remain some inconsistency in the structure of the ULDC that results in requirement for additional setbacks for townhome, ZLL, and single family homes within a PUD. While Petitioner is not requesting a modification to that requirement at this time, it may be worthwhile to consider amendment to allow consistent measurement from the perimeter of a PUD for all uses.

CONCLUSION

On behalf of the Petitioner, Miskel Backman, LLP respectfully requests approval of the Setback PPR Application to amend Table 3.D.2.A, Townhouse Property Development Regulations, to require a 15 foot rear setback rather than a 25 foot rear setback, which will provide greater flexibility for townhouse development, ensure more efficient use of land, and aid in the prevention of sprawl.
