



Department of City Development
City Plan Commission
Redevelopment Authority of the City of Milwaukee
Neighborhood Improvement Development Corporation

Lafayette L. Crump
Commissioner

Vanessa L. Koster
Deputy Commissioner

CITY PLAN COMMISSION ZONING REPORT

File No: [240997](#)

Proposal: This file relates to the creation of a new zoning district titled “RT5” within the two-family residential zoning districts (RT1-RT4). The use, development and design standards for the RT5 district are similar to the existing RT4 district. However, the maximum number of dwelling units permitted in a multi-family building in the RT5 district would be 8 units, compared to 4 units in the RT4 district. Adoption of the ordinance and creation of the RT5 zoning district would not apply the district at any property in the city, and there are not currently pending proposals to map this new zoning district on any individual parcels. Changing the zoning of any property to RT5 would require future Common Council action via the Zoning Map amendment process, providing for local neighborhood review and input, and the review of the City Plan Commission and Common Council.

Analysis: This file would create a new zoning district designed to accommodate a variety of “missing middle” housing types, including small neighborhood scale multi-family buildings of up to 8 units.

The design standards for the RT5 district are similar to those for the RT4 district, with a few variations to reflect the goals of the RT5 district. Parking requirements mirror those of the RT4 district (2 parking spaces required for every 3 dwelling units). The minimum lot width for attached housing (town homes) is proposed to be 16’ (versus 18’ in RT4) to accommodate fee-simple town home development. The lot area per dwelling unit minimum is proposed to be 800 sq. ft. to align with the goal of accommodating neighborhood scale small multi-family buildings. The proposed maximum lot coverage ratios (70% for interior lots / 85% for corner lots) and maximum building height (48 feet) are the same as in the RT4 district.

The ordinance also proposes to establish two new standards related to residential driveways on parcels containing 8 or fewer units that would apply within all residential zoning districts. The ordinance proposes to limit the width of access drives to no more than 18 feet where the access drive intersects with the public right-of-way. It also proposes that no more than one access drive shall be permitted along any street frontage of the parcel. Both of these proposals will support walkable pedestrian environments by limiting the impact of curb cuts and

driveways on residential streets. This aligns with the City's Principles of Urban Design and Complete Streets Policy. They are being proposed alongside the creation of the RT5 zoning district since these adjustments may be especially relevant as new townhome style developments may be constructed in the future.

Public Engagement: DCD Planning has carried out significant public engagement over the past 18 months during the development of the pending update to the Housing element of the City's Comprehensive Plan. There has been support for creating new, neighborhood scale, small multi-family housing expressed by many residents during that process. There have also been significant concerns expressed about the impacts of permitting small multi-family developments "as-of-right" within residential neighborhoods, especially related to the potential that permitting small multi-family housing may result in speculative investors acquiring property that may otherwise facilitate homeownership opportunities, or contribute to the risks of displacing existing residents.

The proposal to create the RT5 district is consistent with resident feedback that while the additional missing middle styles of housing permitted in the RT5 district may be appropriate in certain locations and context, additional location-specific analysis and neighborhood review should be utilized in determining where to permit these styles of homes via the zoning map amendment process (including neighborhood, CPC, and Common Council review of any proposal to apply the RT5 zoning district at locations within the city).

Consistency with the Comprehensive Plan: Implementing strategies to facilitate additional housing diversity and neighborhood scale housing in neighborhoods near commercial corridors, transit stops, and other amenities, are consistent with the recommendations of the Comprehensive Plan, including the Citywide Policy Plan and the Climate & Equity Plan.

The ordinance creating the RT5 zoning district does not apply this zoning district at any property within the city. Any future proposal to apply the RT5 zoning district to a specific property or area would follow the standards in the Milwaukee Code of Ordinances for a Zoning Map amendment, including a requirement that the proposal is consistent with the Comprehensive Plan, and applicable Area Plans; therefore, application of the RT5 zoning district would occur only after the public approval process including CPC and Common Council review to confirm that any proposal aligns with comprehensive and area planning goals.

Zoning Code
Technical
Committee:

The Zoning Code Technical Committee (ZCTC) reviewed the initial draft of this proposed ordinance on February 5th, 2025. DCD and City Attorney's Office representatives to ZCTC raised a small number of technical concerns with the initial draft of the ordinance and ZCTC was unable to reach a consensus on whether that draft of the ordinance met the ZCTC review criteria with respect to legality and

enforceability, administrative efficiency, and consistency with the format of the zoning code.

After review by ZCTC, an updated version of the ordinance has been drafted and submitted for CPC review (“Proposed Substitute A”). The Proposed Substitute A includes adjustments that address the concerns raised at ZCTC.

Staff

Recommendation:

This proposed new RT5 zoning district would create a new tool to enable “missing middle” housing options at appropriate locations, supporting overall city-wide housing goals of increasing housing choice and walkable urban neighborhoods. This could include areas such as corner lots, parcels along major streets, uniquely configured lots, and other locations near transit and walkable commercial corridors where permitting small multi-family dwellings aligns with neighborhood housing goals and the comprehensive plan and does not conflict with the City’s Anti-Displacement Plan.

The proposed “Substitute A” incorporates adjustments that address the concerns raised by ZCTC.

Creating this new zoning district as an “unmapped” zone allows for further neighborhood level review prior to it being applied at any specific area, consistent with feedback received from residents and neighborhood groups in areas that may be especially vulnerable to displacement.

Therefore, staff recommends approval of this item, conditioned upon further technical adjustments to the purpose statement that may better support future implementation of this ordinance¹.

¹ DCD Staff recommends adjusting the purpose statement as follows:

d. RT5 District. The purpose of the RT5 district is to promote, preserve and protect neighborhoods intended primarily for one- and 2-family dwellings while also permitting a mixture of single-family dwellings and small multi-family dwellings of 3 to 8 units. This district is intended to be applied within areas where this wider mix of housing styles is recommended by the comprehensive plan, or at individual parcels within one- and 2-family neighborhoods with such as corner lots, parcels along major streets, uniquely configured lots, and other locations near transit and walkable commercial corridors where permitting small multi-family dwellings aligns with neighborhood housing goals and the comprehensive plan. This district also allows traditional corner commercial establishments commonly found in urban neighborhoods.