

Chapter 11

The 2045 Plan & Implementation

Introduction

The Comprehensive Plan starts with the Vision for the Town of Clayton followed by the Future Land Use Plan. A description of each future land use category and other map components further describe how these area may look, as well as providing policy directives created to address the many land use, transportation, and economic development issues the Town will face. Lastly, an Implementation Plan was prepared to identify critical actions the Town should consider which will 'move the needle' towards achieving the individual and collective vision for the community.

The Vision

The Vision for the Town of Clayton is a projection of what today's officials and residents want the town to look and be like at the end of the Plan's twenty-year timeframe, 2045. However, this update effort takes more initiative to attain the vision. Hence the motto: "The best way to predict Clayton's future is to create it". A general description of each plan component's vision is contained below:

- **Issues & Opportunities:** Clayton will have a town center with a town hall and fire station, housing for senior citizens, young individuals, and new families, as well as a retail environment that meets the daily shopping needs of the town's changing demographics. Larsen will be revitalized as a model of small-town, rural community life. Intensive development will occur generally east to west in the Town.
- **Housing:** Acknowledging the shortage of housing, the Town of Clayton will provide diversified choices of housing design to accommodate young individuals and families and those interested in down-sizing for economic or maintenance reasons. Clayton will offer a variety of housing and lot sizes ranging from small single-family units to multiple unit townhouses and small apartments distributed in a planned neighborhood environment. Quality, well-designed homes that meet the Missing Middle definition will be encouraged in designated areas and senior housing will be supported as an integrated part of the community. Higher density housing will be encouraged in areas served by public sewer and water and low density rural residential (subdivision) development will be limited to the Tier 2 area. Conservation and/or cluster subdivisions will be encouraged along with green or sustainable building practices for both construction and maintenance.

- Economic Development:** Clayton will offer the best of both worlds. Larsen will reflect a rural community while the development of business and industrial districts in the USH 10 and WIS 76 corridors attracts high quality occupants that reflect today's architectural and design standards. Clayton will view economic development as more than simply an expanded tax base and will welcome development that enhances the aesthetics, livability, and social aspects of our community. Economic, environmental and community benefits will be considered as primary elements for prospective development. The incorporation of mixed use and planned unit developments will cater to the changing preferences of upcoming generations which are attracted to urban, walkable communities that provide employment opportunities.
- Transportation:** Clayton will have an efficient transportation system that includes roads ranging from four-lane free- ways to two-lane town roads; main and spur line railroads; and well-connected on and off-road trails that accommodate a variety of motorized and non-motorized uses. The system's efficiency is made possible by concentrating development in several different areas in the town. Town roads will continue to be built and maintained to rural road standards in Tiers 2 and 3, but to urbanized standards in Tier 1. Street design and traffic control systems are used to maximize traffic and pedestrian safety and reduce traffic congestion.
- Agricultural, Natural, and Cultural Resources:** The Town of Clayton will use its Working Lands Initiative to protect its agricultural legacy as a sustainable economic resource. Farming in the Town will be a combination of large and small farms operated based on economic performance, responsible stewardship, and local and national need. Farmers supply food locally, use waste-to-energy technology, and foster the use of renewable solar energy on their lands.
- Utilities and Community Facilities:** Clayton will offer the best available municipal facilities and services to meet the demands of existing and future residents. The extension of public sewer and water infrastructure within the eastern portion of the Town will create new development opportunities and will help to protect the Town's surface and groundwater resources. The Town will phase in new growth based on the cost-effective extension of these utilities and their ability to utilize TID #1 funds for financing work as appropriate. The Town will leverage the provision of sewer within the hamlet of Larsen as an opportunity to revitalize this portion of the community.
- Parks & Trails:** The Town of Clayton has an extensive network of well-maintained multi-use destination trails. We also offer parks that emphasize nature as well as provide specialized athletic facilities which meet current recreational trends.



- Land Use:** Clayton will encourage future residential, commercial and industrial development to locate in areas where municipal services are available. Opportunities for infill development will be identified and promoted. Residential subdivisions outside of the areas with water and sanitary sewer will be limited. The town will use its Working Lands Initiative to protect its agricultural resources and legacy. Agriculture will be given every opportunity to sustain in areas not within targeted growth areas. The preservation of natural areas, open space, and use of natural landscaping is central to making land development decisions. The Town is visually attractive to residents and visitors in both the urban and rural areas and design standards are in place to ensure quality development. New residential neighborhoods are safe and protected through effective land use planning, greenspace, trails, lighting and noise regulations, zoning, and the separation of commercial and residential traffic. Developments are encouraged to minimize infrastructure costs and maximize preservation of open space. Creative urban design, the increased use of sustainable practices and renewable energy give meaning to the provision of affordable workforce housing within mixed-use neighborhoods, creating both a sense of community and an identity for the Town. In summary, the Town of Clayton seeks to achieve and sustain “A Touch of Country in a Growing Community”.
- Intergovernmental Cooperation:** Clayton will work with other municipalities in developing services that will provide mutual benefit in a cost-effective manner. The boundaries of the Town of Clayton have remained intact due to the Town providing water and sewer services in the developing areas in the eastern portion of the town. Storm water management will be designed and constructed within a regional framework that utilizes protected wetlands and waterways as a base for its functional design. Border agreements will be sought with neighboring villages and cities.
- Implementation:** The Town maintains an effective comprehensive plan and land development process that encourages orderly growth through the utilization of citizen participation, quality technical and professional staff, and an active Plan Commission. Planning and zoning are consistent, and long-term community planning goals are not sacrificed for short-term development. Design Standards for commercial, industrial, and multi-family uses are essential to achieve quality development. The Town’s proactive code enforcement controls such things as junk cars, unscreened outdoor storage, illegal signs, litter, and similar blighting influences. The Town assumes responsibility for zoning controls assuring fair reviews, due process and proper interpretation of the codes.

Goals and Objectives

Goals and Objectives for each plan element can be found within those respective document chapters. The goal and objective statements comprise the direction for addressing future land use changes and their impacts upon various plan element topics.

Future Land Use Plan

The Future Land Use Plan (Map 11-1) for the Town of Clayton shows the expected future land use for the year 2045. In some areas, the future land use is the same as the existing land use. In other areas the land use is projected to change. Significant adjustments to the allocation of lands for future development occurred as part of this comprehensive plan update effort due to the recent existence of public sewer and water infrastructure and compatibility issues with the Airport Zoning Overlay. The result of the planning process produced a revised Future Land Use Plan that includes far more detail relative to the types and location of residential, business, industrial, and recreational uses in the eastern third of the town.

Whether or not a property will actually change from the existing land use to the projected or planned land use will depend on its owner. The Future Land Use Plan does not prohibit a property owner from continuing to use his/her property for the existing land use even if the Future Land Use Plan shows a different land use. If a property owner wants to develop or sell the property for a use other than the existing land use, the proposed future land use must be consistent with the Future Land Use Plan, or the property owner must submit an application to have the Future Land Use Plan amended to be consistent with the proposed future land use.

The Future Land Use Plan is based on the following:

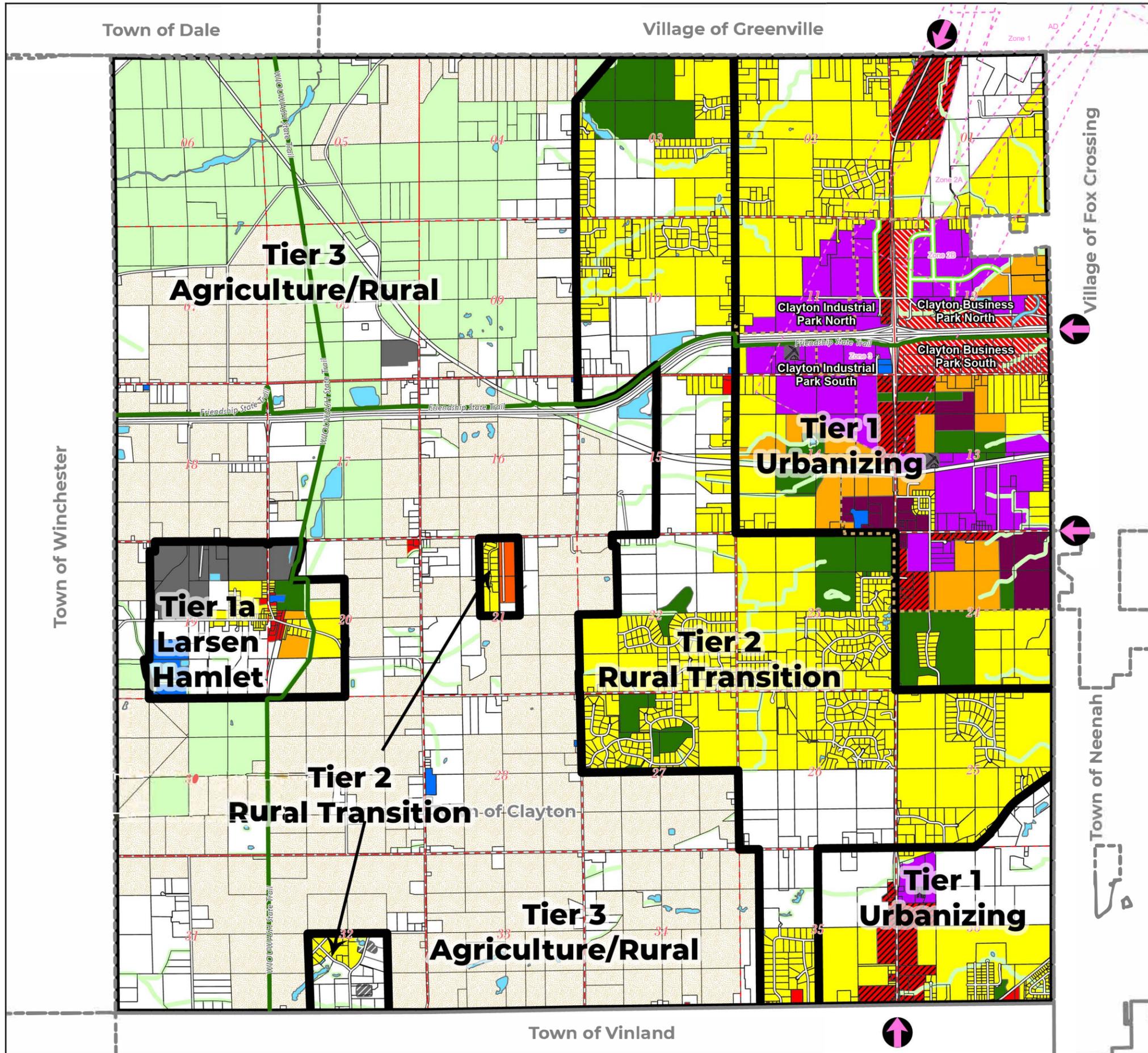
- Future public water and sewer will be provided for properties with the Clayton Sanitary District #1. The Town of Clayton has begun implementing the recommended option for the provision of public water and sewer to the eastern third of the Town. The recommendations have been utilized in the adjustments made to the Future Land Use Plan Map.
- While projections for residential and business growth were made based on population projections and the ratio of residents per acre of business land, the amount of acreage for these major land use categories shown on the Future Land Use Map knowingly exceeds the number of acres projected. The reason for this is to plan for a longer-term period (beyond 20 years) as well as to allow property owners and developers additional flexibility in terms of the land market so that options exist for where development takes place.
- Proposals for development will be reviewed with respect to their continuation of the existing land use pattern, their consistency with the Future Land Use Plan, and their ability to be provided with public water and sewer service, if needed. This plan recognizes the potential 'highest and best' use of lands bas on unique factors such as transportation access.
- The Town of Clayton recognizes that it is not possible to be completely accurate with the mapping of existing land uses in the Town of Clayton. If an inaccuracy is brought to the attention of the Town of Clayton, the Plan Commission shall make a determination as to the correct existing land use and its impact on the Future Land Use Plan map. If the Plan Commission determines that a correction is needed, it will make a recommendation to the Town Board that the Comprehensive Plan and related maps be amended to reflect the determination.



Town of Clayton

Winnebago County

Future Land Use (2045)



- Agriculture/Rural
- Conservation/Greenspace
- Working Lands Overlay
- Residential - Single and Duplex
- Medium and High Density Residential
- Neighborhood Center Mixed Use
- Manufactured Housing
- Business
- Business Park
- Gateway Commercial & Retail
- Light Industrial, Warehousing, and Distribution
- Utilities and Public Facilities
- Parks and Recreation
- Abandoned Landfill Site
- Open Water/Pond/Lake
- Non-Metallic Mining Sites
- Other Non-Metallic Mining Sites

Proposed Roads

- New

Other Features

- Tiered Development Boundaries
- Cities, Towns, & Villages
- Sections
- Parcels
- Airport Zoning
- Town of Clayton Sanitary District #1
- Roads
- Commercial Gateways


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This base map was created with data from Winnebago County Planning Department who assumes no liability for the accuracy of this data and any use or misuse of its content is the responsibility of the user. Changes were made by Cedar Corporation under the direction of the Town of Clayton.

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Tiered Development System (TDS)

Development Tiers

New to the Comprehensive Plan, the updated Future Land Use Map (Map 11-1) proposes general land use policies which guide the development of new housing based on percentage allocations to a Tiered Development System (TDS). The TDS recognizes the overall existing and future character of development based on the need for services and the desired future density of development in order to reduce ‘urban vs. rural’ conflicts. A number of basic characteristics and provisions for future land use within each Tier were created by the Plan Commission,

Tier 1 – Urbanizing (85% of new housing)

- Sanitary District No. 1
- Full Services (water/sewer)
- Higher Density Development
- Urban Road Standards
- Includes TID #1

- Greenspace Incorporation
- Conservation Subdivision Opportunities
- Shadow-Platting Requirements to accommodate future density increases.

Tier 1a – Urbanizing (Larsen Hamlet)

- Partial Services (sewer, no water)
- Higher Density Development
- Small Community Feel
- Growth for Existing Industries

Tier 3 – Rural Agriculture (5% of new housing)

- “Working Lands” (agriculture, forestry, subsistence farming)
- Right to Farm
- Mining
- Natural Areas
- Renewable Energy Opportunities
- CSM Land Divisions Only – No Subdivisions.

Tier 2 – Rural Transition (10% of new housing)

- Large Lot Residential
- On-Site Wastewater & Private Wells

The Plan Commission also reviews options for, and agreed upon, a set of ‘targets’ for the amount (percentage) of new housing development which would be allocated to each Tier in order to better manage growth (Table 11-1). The proposed TDS would therefore allocate at least 85% of new residential growth into the urbanizing Tier 1, where it can be best accommodated.

Table 11-1: Town of Clayton Tiered Development System Allocations

Allocation Policy	Tier 1 (Urbanizing)	Tier 2 (Rural Transition)	Tier 3 (Ag/Rural)	Totals
% of Total Projected Housing Units	85%	10%	5%	100%
Housing Unit Allocation by Tier	922	109	54	1,085
Units/Yr. Equivalent (18 yrs. ['22-'40])	51	6	3	60

Note: There are 1,085 total projected housing units between 2022 and 2040 based on selected Plan scenario (75% increase in units).



The Plan Commission is currently considering the use of “new lot creation” to measure and monitor where and how much new housing is allowed within each Tier. Hence, new homes on existing lots of record would not count toward the allocation limits, but they would still be tracked for informational purposes. Multi-unit residential developments would also be tracked, as more than one unit can exist on a single lot of record.

Future Land Use Categories & Descriptions



Agriculture/Rural (Tier 3 lands)

The Agriculture/Rural district exists to continue the accommodation of the Town’s agricultural activities. These rural lands are used for a variety of crops and other agricultural purposes and are planned to continue throughout the life of the Plan with minimal changes in land use. In general, the Agriculture/Rural district shall:

- Accommodate new forms of agriculture such as organic farms and farms that provide fresh produce to local stores, restaurants, and individuals.
- Allow for the production of renewable energy, per the Solar Energy System Overlay (see separate discussion and map).
- Accommodate rural residential uses only within the limits of the Tiered Development System housing allocations, preferably on existing lots of record.



Agriculture/Rural “Working Lands” Overlay (Tier 3)

The objective of the Town’s Working Lands Initiative is to protect and foster the Town’s agricultural heritage and agricultural industry. The Working Lands Initiative was formalized as part of an amendment to the Comprehensive Plan in 2017 based on input from the public at that time which desired more detailed analysis of the current “Agricultural and Rural Residential” areas into the new “Working Lands” designation provides better focus to preserving the agricultural and open space areas of the Town of Clayton.

The designation of a Working Lands overlay to the Agriculture/Rural future land use category has support but comes with the need for a better understanding of the role or function on how Working Lands will be administered in the Town. It is expected that at times in the future, the Working Lands designation may be challenged by land owners who wish to propose certain uses which may or may not be related to agriculture. In an effort to provide more guidance to the land owners and town officials, more detailed verbiage has been developed to help guide the plan. Examples include the process for opting both in and out of the Working Lands designation, types of agricultural related business which could co-exist, the term’s relationship to the Winnebago Farmland Preservation Plan and the Town Zoning Ordinance just to mention a few. What follows is more detailed guidance on the administration of the Working Lands Initiative.

Glossary of Terms

The administration of the Town's Working Lands Initiative requires some understanding of terminology. The following terms are clarified:

- Nonfarm Residence or Use: Any residence or use that has no association with agriculture use or agriculture related uses.
- Farm and/or Agricultural Use or Agricultural Related Use Residence: A single-family or two family residence that is the only residential structure on the farm or agricultural parcel that is occupied by any one of the following:
 - (1) An owner or operator of the farm or agricultural parcel owner.
 - (2) A parent or child of an owner or operator of the farm or agricultural parcel owner.
 - (3) An individual who produces agricultural products from the parcel for sale and/or personal sustenance.

Residential "Agrihoods" which are directly connected to farming operations which support the agrihood development with farm produce.

Agricultural Use: Any of the following activities conducted for the purpose of producing an income or livelihood:

- (1) Crop or forage production.
- (2) Keeping livestock.
- (3) Beekeeping.
- (4) Nursery, sod, or Christmas tree production.
- (5) Floriculture.
- (6) Aquaculture.
- (7) Fur farming.
- (8) Forest management (Includes tree farms).
- (9) Enrolling land in a federal agricultural commodity payment program or a federal or state agricultural land conservation payment program.
- (10) Any other use that the Department of Agriculture, Trade and Consumer Protection, by rule, identifies as an agricultural use.
- (11) Equestrian boarding, training and riding facilities* including supporting pasture and crop land.
- (12) Any other use that the Town approves of as an agricultural use*.

** Definition is not recognized by DATCP as an Agricultural Use*

Agriculture-related use: An agricultural equipment dealership, facility providing agricultural supplies, facility for storing or processing agricultural products, or facility for processing agricultural wastes. In addition, any use that the Department of Agriculture, Trade and Consumer Protection identifies by rule as an agriculture-related use. An "agricultural related use" must be primary (not just incidentally) related to agriculture and must have a direct connection to agriculture uses.



Working Lands Designation Criteria

The lands designated “Working Lands” are included in the “Agricultural/Rural” category on the Town of Clayton Future Land Use Map (Map 11-1) found within the Comprehensive Plan. The Working Lands overlay is comprised of land which was part of a detailed analysis which included specific criteria. The criteria were as follows:

- (1) Contiguous agricultural land west of an East/West Boundary Line (Primarily Center Road) were included in the Working Lands Analysis. Land east of this generalized boundary line is generally, but not exclusively, used for other uses.
- (2) Includes cropped parcels >5 acres where 50% or more is being actively farmed (air photo interpretation).
- (3) All parcels < 5 acres were excluded.
- (4) Any parcels zoned other than A-1 or A-2 were excluded.
- (5) Non-farm parcels (ex; wooded, wetlands, residential and other non-farm intensive type land uses) were excluded.
- (6) Several minor adjustments for inclusion into the Working Lands designation were made for parcels based on parcel ownership and current operations (Active Farming). These additions have been documented.

The above Land Analysis was conducted using GIS software and were mapped accordingly. A copy of the Land Analysis Map is available for the record but is not included in the Comprehensive Plan.

Requesting Land for Inclusion into the Working Lands Designation

For lands to be added to the Working Lands designation, a comprehensive plan amendment shall be required. Adding land into the Working Lands designation acknowledges the use of the land for agriculture management and agriculture related business and activities. Designation as “Working Lands” also offers property owners the “right to farm” in the Town when farming practices are challenged by non-farm residents. For land to be eligible for inclusion in the “Working Lands” designation, the parcels must generally meet criteria 1 & 2 listed above.

Requesting Land for Removal from the Working Lands Designation

For lands to be removed from the Working Lands designation, a comprehensive plan amendment shall be required. Reasons for removal could vary but it is assumed the reasons would likely include an interest by the land owner to propose a use contrary to agriculture or agricultural related use. In review of such applications, staff reviews should consider the impact



to adjacent agricultural properties and list any potential concerns which may threaten the continuation of agricultural practices to the immediate area. Any future land divisions shall include the “Right to Farm” provisions consistent with past town policy.

As with any comprehensive plan amendment, the basic process would include an application filed by the applicant, review by Town Staff, public hearing and approval by both the Town Plan Commission and Town Board.

Inclusion of Town of Clayton Working Lands into the Winnebago County Farmland Preservation Plan *(OLD PLAN TEXT - TO BE DISCUSSED AT MEETING)*

History has shown some reluctance by agricultural land owners to have their lands designated as farmland preservation areas within the Winnebago County Farmland Preservation Plan. Reasons include but are not limited to the fear of losing control of future development rights, program requirements like Nutrient Management Plans and the amount of tax credit obtain verses the overall requirements. However, the concept of the Town of Clayton Working Lands overlay designation is totally independent of DATCP requirements. The concept is grounded on the desire to keep agriculture as a viable land use type within the Town while focusing more intensive development in the eastern third of the town.

Working Lands as identified in the Town of Clayton Comprehensive Plan shall be recommended for inclusion into the 2017 update of the Winnebago County Farmland Preservation Plan. However, since the farmland preservation plan is a county administered process by statute (Wis. Stats Chapter 91), the county will ultimately decide what lands based on criteria will be submitted to DATCP for certification. Since the Town has established criteria for the identified Working Lands, it is likely these lands would meet DATCP requirements.

The inclusion of Working Lands into the Winnebago County Farmland Preservation Plan opens the opportunity for farmland preservation tax credits through A-1 zoning or the eventual development of an Agriculture Enterprise Area (AEA). In addition, the identification of Working Lands offers land owners within the overlay some protection from incompatible adjacent land use while maintaining development densities conducive to agricultural practices.

However, it should also be noted, that programs such as farmland preservation zoning (currently the A-1 District in the Town Zoning Ordinance) and the implementation of an AEA (Agriculture Enterprise Areas) program through DATCP is certainly consistent with the Working Lands overlay objectives. Of greater importance is to know that Working Lands not included in the certified Winnebago County Farmland Preservation Plan are ineligible for any future DATCP farmland preservation tax credits even through an AEA. An important detail to note when updates to the Winnebago County Farmland Preservation Plan occur.

Agriculture Enterprise Areas (AEA's) within the Town

Based on some of the reluctance by agricultural land owners to have their lands zoned A-1 due to reasons previously mentioned, DATCP's AEA (Agriculture Enterprise Areas) program may provide more flexibility for the Town Leaders and agricultural land owners alike. An AEA is an area of contiguous land primarily in agricultural use that has been designated by the Department of Agriculture, Trade and Consumer Protection (DATCP) in response to a locally developed petition. The Town of Clayton's Working Lands overlay documents areas where petitions could be arranged. Eligible farmers in a designated area can enter into voluntary farmland preservation agreements with DATCP. Farmers with an agreement receive income tax credits in return for keeping their land in agricultural use for a minimum of 15 years. An AEA may only be designated if it is identified by the local community (in this case, the Town of Clayton) as an area that is valuable for current and future agricultural use. This local input into the process is important to achieve identified goals. Overall, the designation is a tool that can be used to protect the agricultural land base for continued production. In addition, the designation can help to promote investment in agriculture, agricultural infrastructure and agricultural-related businesses. The establishment and implementation of the Town's Working Lands overlay certainly supports this DATCP requirement to establish an AEA.

The designation of an AEA does not, by itself, control or limit land use within the designated area. Local zoning will. Designation of an AEA also does not specifically protect areas from encroaching development or land use conflicts. Local designation of an AEA, however, can be used as part of a local land use and development "package" designed to preserve, protect and promote agricultural enterprises. Hence, this program seems to act "in-step" with the Town of Clayton Working Lands overlay designation. Again, lands not identified within the Winnebago County Farmland Preservation Plan are ineligible for an AEA designation. Landowners interested in pursuing an AEA designation are encouraged to review application details found on the DATCP web site by searching "Agriculture Enterprise Areas".

Policies for Working Lands

To clarify, the following policies are part of the Working Lands designation:

- (1) Working Lands as identified in the Town of Clayton Comprehensive Plan shall be recommended for inclusion into the Winnebago County Farmland Preservation Plan should one be developed in the future. However, since the farmland preservation plan is a county administered process by statute (Wis. Stats Chapter 91), the county will ultimately decide what lands based on criteria will be submitted to DATCP for certification. Since the Town has established criteria for the identified Working Lands, it is likely these lands would meet DATCP requirements.

- (2) A comprehensive plan amendment should be required to develop non-farm related development in areas designated Working Lands. Conversely, land outside of an identified Working Lands area, that would be requested into the Working Lands designation, would require a comprehensive plan amendment as well. An example of this scenario would be a farm expansion where land is purchased by an area farmer for agricultural purposes.
- (3) It is envisioned that the inclusion of designating Working Lands as part of the Future Land Use Plan will provide better direction in balancing agricultural activity with the location future residential development. This should improve compatibility between the two uses, which in the past has clashed because of a lack of land use planning and proper implementation. The designation of established Working Land areas also drives development into areas which are planned to have a higher level of public infrastructure supporting it such as municipal water and sewer service.

Conservation/Green Space (Tiers 1, 2, and 3)

The conservation of the Town's natural and cultural resources ranked high amongst Public Opinion Survey respondents. The lands identified within this District contain all WDNR owned properties, WDNR identified wetlands, and existing navigable streams and their associated 75-foot regulatory setback buffer within each of the three Development Tiers.

These lands provide a variety of ecosystem management functions, as well great value from a recreation and wildlife habitat standpoint. All of which help to contribute to the Town's character as being a "Touch of Country". Watershed management will be important for agriculture, water quality, and wildlife habitat. The Town will support efforts which protect and minimize impacts to wetland, floodplains, and shoreland areas during the development process. Conservation/Green Space lands also provide a buffering function between agriculture and current or future development.

Residential – Single Family & Duplex (Tier 1 and Tier 2 lands)

This district includes existing and new areas of development and is present in various portions of the Town, but mainly located within the Tier 1 (urbanizing) and Tier 2 (rural transition) designated areas and can be described as follows:

- Tier 1 – This district is intended to accommodate both single-family and duplex residential housing units that are connected to public sewer and water. Depending on its location the planned densities for new residential development should fall between 4 and 8 dwelling units per acre. Increasing the density of these areas can help with the creation of affordable housing, as well as the cost-effectiveness of providing sewer and water. Increased density, urbanized street designs, and quality home design can be major factors in the creation of new neighborhoods that are walkable and safe for bicycles and pedestrians. Within the Airport Zone 2b and Zone 3, the densities can be a maximum of 0.5 units per acre and 1 unit per acre, respectively. Outside of those zones, a variety of lots sizes should be provided that targets between 4 and 8 dwelling units per acre. Other characteristics of new development within this district include:

- This is land that has been subdivided by plat and has a municipal or community source of water and sewer.
- Densities will range from four to eight units per acre with a combination of single-family and duplex development.
- Small lots (perhaps as small as 8,500 square feet) should be considered and encouraged within every new subdivision plat to accommodate smaller homes.
- The location of this type of subdivision shall be within the Clayton Sanitary District #1 and shall be cost-effective to serve with sewer and water.
- The development of this type of subdivision will require a Residential – Single and Duplex land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - R-2 Suburban Residential
 - R-3 Two-Family Residential
 - R-8 Manufactured Housing Community

In addition to accommodating typical urban and suburban housing styles, this district should also contemplate the use of Accessory Dwelling Units (ADUs). Homeowners may desire to add ADUs for different reasons including as an income-generating investment, or to help address multi-generational or palliative care needs. The demands for ADUs are expected to increase during the planning period as the local, state, and national home affordability continues to be an issue. Communities can find broader benefits through the allowance of ADUs, including the addition of attainable units to the existing housing mix, providing housing units in that are appropriate for people at a variety of stages in the life cycle, and to protect neighborhood stability, pride of ownership, and property values.

- Tier 2 – This district is intended to accommodate a limited number of new unsewered subdivisions and may also include duplexes as appropriate. While this type of residential development can be found scattered throughout the east half of the town, the highest concentration of this type can be found in Sections 2, 3, 10, 22, 23, 25, 26, 27, 35, and 36.
 - This is land that has been subdivided by plat or certified survey map, has dedicated roads, and private water and sewer systems located on the lot they serve.
 - This type of subdivision is likely to be located adjacent to existing unsewered subdivisions.
 - Accommodations will be made for “shadow-platting” (see sidebar) to allow for future increases in density should municipal utilities need to be extended in the future.
 - The development of this type of subdivision will require a Residential – Single and Duplex land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - R-1 Rural Residential





Medium and High Density Residential (Tier 1)

This district is present in various portions of Tier 1 and is intended to accommodate both “missing middle” housing (see sidebar) as well as limited multiple-family residential uses that are connected to public sewer and water. Lands allocated for this use are located within the Hamlet of Larsen, on either side of E. Grandview Road, as well as along Clayton Avenue (north of USH 10), along the south side of CTH II, east of WIS 76, and; along either side of WIS 76 between CTH II and Fairview Road.

Planned densities in this district should fall between 6 and 12 dwelling units per acre. This district is designed to better accommodate more affordable ‘workforce’ housing on smaller lots (as small as 5,000 square feet). Missing Middle housing types are recommended to provide diverse housing options, including a combination of duplexes, fourplexes, and well-designed six and eight-plex multiple-family apartments, as well as cottage courts, and townhouses. These house-scale buildings should fit seamlessly within residential neighborhoods and support walkability. They provide solutions along a spectrum of affordability to address the mismatch between the available housing stock and shifting demographics combined with the growing demand for walkability. Other characteristics of new development in this district include:

- Urbanized streets with bicycle and pedestrian accommodations (sidewalks) are required in this district.
- Densities shall be between 6 and 12 units per acre.
- Housing types should be varied in size and style.
- Apartment units should not exceed 8 units per building and should not be concentrated within a single subdivision.
- The development of this type of subdivision will require a Medium & High Density Residential land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - R-2 - Suburban Residential
 - R-3 – Two-Family Residential
 - R-4 - Multi-Family Residential



Neighborhood Center Mixed Use District (Tier 1)

Mixed use development is an important component of the Comprehensive Plan. Development of traditional neighborhoods and denser, yet livable schemes, will bring a uniqueness to the market of available living options in the Fox Cities. This district is located in three specific areas: at the southwest intersection of the CTH II and Clayton Avenue; within the northeast and northwest quadrants of the CTH II / WIS 76 intersection, and; within the interior of lands south of Fairview Road and east of WIS 76 (Map 11-1). These areas are intended to accommodate development of neighborhood centers that are small, moderate-impact, functional areas for commerce and social gathering. They are typically pedestrian and bicycle-oriented, with limited automobile access and parking.

WHAT IS MISSING MIDDLE HOUSING?

“Missing middle housing” refers to housing types that fall somewhere in between a single-family home and mid-rise apartment buildings – such as townhomes, duplexes, triplexes, and courtyard clusters. See Chapter 3 - Housing for more information.



Neighborhood centers are generally well-integrated into the fabric of the surrounding residential area and allow for the creation of “social capital” by virtue of new gathering places (3rd spaces) and civic uses. They are intended to serve as an amenity for residents of the immediate neighborhood and support a variety of uses.

Neighborhood centers should generally include a limited range of convenience goods and services in keeping with the character and scale of the surrounding neighborhood. Business types desired in this District would include, but not be limited to those that provide high levels of social engagement such as coffee shops, craft breweries, indoor/outdoor event space, restaurants, and other retail establishments, etc. Secondary uses include other supporting, neighborhood-oriented uses such as schools, small offices, day care, parks, and civic facilities, as well as residential uses. The integration of new civic uses, such as the potential new Town of Clayton Municipal/Public Safety Facility near CTH 11 and STH 76, will help to create local destinations and gathering places. Appropriate residential types may include upper floor units located above retail uses, townhouses, and small lot, single-family detached homes. The integration of residential uses helps to assure extended hours of activity within the district and support a mix of uses.

The district balances automobile access from arterial streets with pedestrian and bicycle access and circulation and provides good transitions and connectivity with the surrounding neighborhoods. Surface parking is more limited, with shared parking opportunities and on-street parking. For mixed use development to succeed, varied land uses must be within convenient walking distance of each other (one quarter mile, 5-10 minutes) and there must be direct, safe, and convenient connections between the uses. Residents in mixed use developments should be able to take care of many daily needs without having to drive elsewhere.

In addition, mixed use developments can enhance opportunities for those who are working from home such as was experienced during the COVID-19 pandemic. The number of “at-home” workers are expected to remain at much higher levels than they were pre-pandemic as businesses attempt to attract workers and reduce overhead costs.

- As Clayton grows, there will be opportunities for mixed-use development, particularly on the north side of CTH “11”, just east and west of STH “76”. Retail, office, and two-family and multifamily residential are the most likely components of these mixed-use development.
- Creating opportunities to address these types of developments through the PUD identified areas will address this growing need.
- The development of this type of subdivision will require a Neighborhood Center Mixed Use land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - R-4 – Multi-Family Residential
 - B-2 - Community Business (conditional use)
 - B-3 – General Business
 - M-1 – Mixed Use



Manufactured Housing District

This district is limited to the location of the Rolling Meadows manufactured home park on the south side of CTH 11, just east of Pioneer Road. A limited area for expansion exists to the south of the existing park.

- Further expansion of this park, or the development of any new manufactured home subdivisions will require a Manufactured Housing land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - R-8 Manufactured Housing Community



Clayton Business Park District

Located along the north and south sides of USH 10, between STH 76 and Clayton Avenue, this district contains much of the visible property that fronts the USH 10 corridor. The accessibility and visibility of these lands is attractive to commercial land uses and it is envisioned, that over time, the existing residential uses along the north side of Fairview Road would be transitioned to commercial based on market forces. Planned light industrial uses are also included in the Clayton Business Park North area primarily due to restrictions imposed on uses within the Airport Zoning Overlay. Examples could include warehousing, distribution centers, and light manufacturing.

Many of these properties are located within the Town's new TID #1 as well as being within the Clayton Sanitary District #1. Therefore a high-level of public services will be available for new businesses within these areas. The potential for development incentives may also be available by virtue of the existing TID #1.

New businesses within this area should be regional in nature and require high-levels of access to the USH 10 and I-41 transportation corridors. New development driven solely by USH 10 traffic counts (i.e. car, boat, RV, trailer dealerships, etc.) shall be discouraged. Instead, high-value employment firms with professional offices, medical and dental facilities, and related uses that attract users to and from the Friendship Trail should be considered within this district.

- New projects shall be connected to sewer and water.
- New projects shall, where necessary, comply with the provisions of the Airport Overlay Zoning District.
- Design standards and site plan review requirements shall be applied to all new development proposals within the Clayton Business Park district.
- The development of this type of commercial development will require a Business Park land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - B-3 – General Business
 - I-1 – Light Industrial



Gateway Commercial & Retail District

This district is designed to welcome visitors into the Clayton community and is located primarily along STH 76, along with some frontage included along CTH II. This district is intended to accommodate typical highway interchange types of uses including fast food, gas stations, restaurants, a grocery store, childcare, banking, and other retail, and service oriented businesses that are aimed at travelers and local residents. Requiring that all development occur under a Planned Unit Development (PUD) condition and utilizing good design standards and site plan review principles will help to ensure the quality of new development and its buildings, and parking areas. Brief descriptions of these four areas follow:

WIS 76 between Winnegamie Drive and the CN Rail Line

The accessibility and visibility of the WIS 76 corridor near the USH 10 interchange is attractive to both commercial and industrial land uses. Uses would be regional in nature, serving a market broader than just the Town of Clayton.

WIS 76/CTH II

The existing business land use pattern in this area will lead to additional development. Businesses will be both regional and local in nature. This is the area in which the day-to-day commercial needs of the residents of the Town of Clayton would be met. This area would likely serve as the Town’s Commercial “Downtown” District. More detailed planning will be required to guide district appearance.

WIS 76/CTH JJ/Breezewood Lane

The development of this area should accommodate the expansion needs of companies currently located in this area or the development of neighborhood type of commercial development. New business opportunities may also be accommodated.

- The development of this type of commercial use will require a Gateway Commercial & Retail land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - B-2 – Community Business
 - B-3 – General Business



Local Business

This district acknowledges several sites scattered across the Town, including along Breezewood Lane, and within the Hamlet of Larsen. The district is intended to accommodate a single retail or service establishment or a small grouping of such establishments that primarily serve the daily needs of residents in the surrounding area. Because this district is characteristically near or within residential areas, standards will be applied to ensure the commercial uses are compatible in appearance and character with the surrounding residential uses.

- The development of this type of commercial use will require a Local Business land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - B-1 – Local Service Business
 - B-2 – Community Business





Light Industrial, Warehousing & Distribution

This District is in several portions of the Town to recognize existing industrial uses within the Town, but also to target new industrial development projects and potentially new renewable energy generation facilities (i.e., solar). Two of the District's sub-areas have been identified based on their relationship to USH 10: Clayton Industrial Park North and Clayton Industrial Park South. Additional lands have been allocated in the northern portion of the Clayton Business Park North area and will transition from those business uses located immediately along the USH 10 corridor. A fourth area is located along CTH II near the Canadian National rail line.

Envisioned uses for these districts include: light manufacturing, contractor offices/storage, warehousing, and distribution types of facilities. Based on information about the regional economy and current industry clusters, the Town should focus its efforts on attracting advanced manufacturing (including renewable energy), professional service, and transportation/logistics businesses to these areas, thereby creating quality employment opportunities which can attract further growth.

If a proposal for a business development requires a rezoning to a business, industrial or manufacturing zoning district, it will be reviewed by the Town of Clayton for the purpose of making a recommendation as to the zoning district that would be applicable and the appropriateness of the property for that zoning district. The Town shall use the Future Land Use Plan Map as the review criteria to respond to any business or industrial rezoning requests. Future rezones must be supported by the Future Land Use Plan Map.

- New projects shall be connected to sewer and water.
- New projects shall, where necessary, comply with the provisions of the Airport Overlay Zoning District.
- Design standards and site plan review requirements shall be applied to all new development proposals within the Clayton Business Park district.
- The development of this type of industrial development will require a Light Industrial, Warehousing, & Distribution land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - I-1 – Light Industrial
 - I-2 – Heavy Industrial



Non-Metallic Mining Sites

Five existing, operational non-metallic mines are located within the Town. These features are identified on the Future Land Use Plan Map with the understanding that the mine's proposed 'end land use' will be dictated under the mine's NR-135 reclamation plans, and which require consistency with the Town's comprehensive plan and zoning regulations.

Utilities & Public Facilities

This District exists to accommodate public uses such the existing Clayton Elementary School located on Fairview Road, as well as places like the current Town Hall, Fire Department, and Public Works facilities, and the Larsen-Winchester Sanitary District's wastewater facilities. The Future Land Use Map also contemplates the location of a new administrative and fire department facility near USH 76 and CTH II. Study was completed in 2021 to assess and identify deficiencies in existing facilities in terms of staffing and equipment space, as well as the protective service needs for newly planned development. The Study concluded that a new Municipal/Public Safety Facility will be needed and that the current Town-owned site along CTH II near WIS 76 is suitable to house such a facility. However, further studies may be needed to adjust to growth patterns as the Town develops. Potential integration of new residential, neighborhood center, and parkland uses should be considered in future location studies.

- The development of this type of use in the future will require a Utilities & Public Facilities land use category on the Future Land Use Plan and being within one of the following zoning districts:
 - P-I Public Institutional

Parks & Recreation

This District encompasses lands which have been identified for future active or passive recreation and conservation lands. This district includes existing and future parks, stream corridor buffers, existing and future stormwater management ponds, and remnant woodlands. This District may also include smaller, more urban parks, plazas, and public gathering spaces that are not necessarily indicated on the map but may be included within the Neighborhood Center Mixed Use District. New parklands will be leveraged to the degree possible using the Town's subdivision ordinance provisions, although purchase and donation methods may also be employed as needed. Specifically, new parklands have been identified as follows:

- East Central Park – This 19.9-acre community park lies south of Fairview Rd. on both sides of WIS 76 in a linear, east-west fashion. To be designed as a more formal, 'urban' park space which serves as a central gathering point for the planned adjacent Neighborhood Mixed Use District, and the community as a whole. This site takes advantage of the existing topography and tremendous eastward views over the Fox Cities all the way to the Niagara Escarpment. The park intentionally extends across WIS 76 to take advantage of the highest point along this stretch, as well as to provide additional greenspace to serve the planned Gateway Commercial & Retail District.
- Neighborhood Park 1 – Approx. 16.0-acre neighborhood park identified north of the CN rail corridor, west of WIS 76 to serve new residents as this area grows.
- Neighborhood Park 2 - Approximate 29.2-acre neighborhood park identified south of the CN rail corridor, west of WIS 76 to serve new residents as this area grows. This area is nearby the selected site for the new Town Administrative and Public Service facility and opportunities to integrate these uses should be examined further. Neighborhood Park 3 - Approximate 9.6-acre neighborhood park located west of Clayton Ave. and south of CTH II, to serve new planned residential neighborhood.

- Conservation Area 1 - Approximate 19.3-acre wetland area north of Larsen Rd. and west of Oakwood Road as a potential passive recreation area serving existing and future rural subdivisions. The southern ½ of this wetland is already owned by the town.
- Conservation Area 2 - Approximate 45.4-acre wooded area lying between Clayton Avenue and WIS 76, just north of the CN rail corridor. This area would provide for passive recreation, outdoor education, and nature trail opportunities and would serve new residents in the urbanizing eastern portion of the Town.



Abandoned Landfill Sites

Two closed landfill sites exist in the southwest portion of the Town, with one property being owned by the Town of Clayton. These sites are not required to be monitored and may cause some concern for any new development locating in close proximity. The Town should discourage new development from locating within or near these areas.

Solar Energy System (SES) Overlay

The Town of Clayton acknowledges the need for the installation of solar energy systems of all scales across the community, and will provide guidance in the form of updated zoning regulations, particularly for large-scale (solar farms) and mid-scale (solar gardens) solar energies systems (SES) and therefore acknowledges Wisconsin Statute §66.0401(1m) as follows:

“Local governments may not place any restriction on the installation or use of solar energy systems unless the restriction:

- Serves to preserve or protect public health or safety.
- Does not significantly increase the system cost or decrease the efficiency.
- Allows for an alternative system of comparable cost and efficiency.”

Clayton further acknowledges the State of Wisconsin’s Preemption as defined by 196.491(3) which states:

“If installation or utilization of a facility for which a certificate of convenience and necessity has been granted is precluded or inhibited by a local ordinance, the installation and utilization of the facility may nevertheless proceed.”

A Certificate of Public Convenience and Necessity (CPCN) is required by the Public Service Commission (PSC) for systems generating 100MW or greater. The process includes an application, public notice, environmental review, community impact review and public hearings before a decision is rendered by the PSC.

The Town of Clayton desires to take a more pro-active approach in the siting of future large-scale SES's to assist in the application process. In order to determine level of restrictions within the Town, Clayton has elected to use its planning authority granted under WI Stats 66.1001 to direct preferred locations that allow for the generation of large-scale solar energy systems while protecting the investments which have been made to existing development patterns in the Town.

Map 11-2 was developed to show accommodating locations based on current land use, residential development density, zoning classifications, and adequate buffering requirements to reduce the potential negative impacts of siting a large-scale Solar Energy Systems. Map 11-2 also shows the locations of existing transmission corridors vital to accommodating any future energy generation. Based on this map, the Town has identified over _____ acres which could potentially accommodate solar farms and solar gardens. The Town will use this map as a guide to working with prospective solar developers on future permitting and approval of such systems, within the limitations of the law. Through the use of this planning approach, Clayton believes the Town has captured the intent of Wisconsin Statute §66.0401(1m).

Land Use Plan and Zoning Consistency

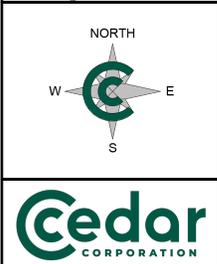
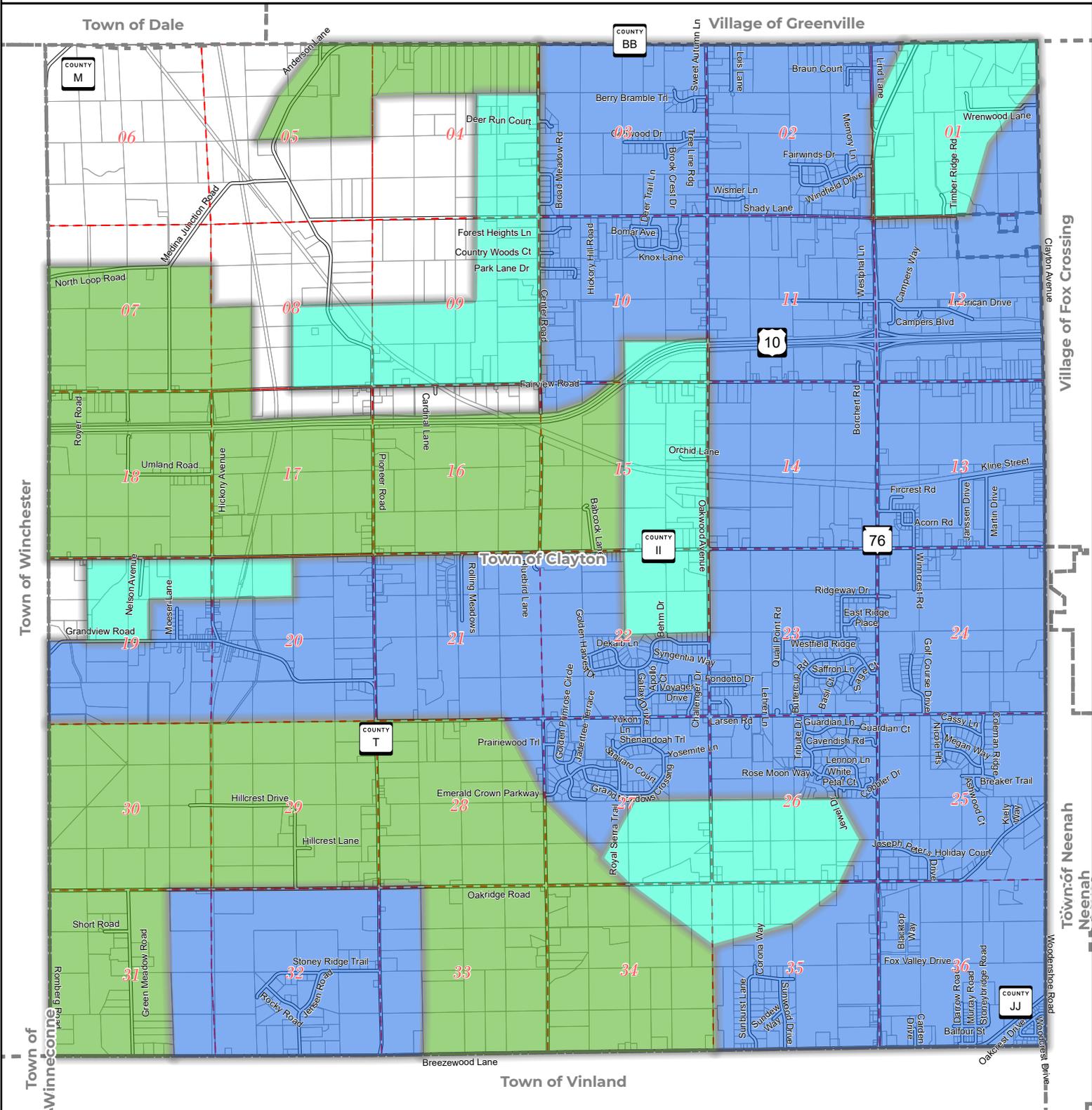
Of particular importance is consistency between the Future Land Use Plan and the Zoning Map. Because zoning reflects the current situation and the Future Land Use Plan map reflects the preferred land use, the two maps initially may not be consistent. The objective is that these two maps would become consistent over a period of time.

On December 17, 2013, the Town developed and adopted The Town of Clayton Zoning Code of Ordinances. It should be noted that Winnebago County still maintains zoning control with shoreland areas (300' of a navigable street and 1000' from a lake or impoundment).

The Town of Clayton has created the following general process for examining proposed land use changes:

1. A proposal for development or an application for a permit that is consistent with the comprehensive plan and the zoning ordinance should be approved.
2. A proposal for development or an application for a permit that is inconsistent with the comprehensive plan but consistent with the zoning ordinance should be approved. The Town, however, has the ability to amend the comprehensive plan to be consistent with the zoning ordinance.

SOLAR ENERGY SYSTEM (SES) SUITABILITY



Town of Clayton Winnebago County, WI

0 4,000 8,000 Feet

This base map was created with data from Winnebago County Land Information Department who assumes no liability for the accuracy of this data and any use or misuse of its content is the responsibility of the user. Changes were made by Cedar Corporation under the direction of the Town of Clayton.

Legend

- Large-Scale
- Medium-Scale
- Small-Scale
- Cities, Towns, & Village Borders
- Sections
- Parcels

3. When a proposal for development or an application for a permit is consistent with the comprehensive plan but not with the zoning ordinance, an application may be submitted to the Town to amend the zoning ordinance, so it is consistent with the comprehensive plan. The Town's expectation is that the amendment would be approved.
4. A proposal for development or an application for a permit that is inconsistent with both the comprehensive plan and the zoning ordinance should initially be rejected. The Town, however, does have the ability to amend the comprehensive plan and the zoning ordinance so that the proposal is consistent with both.
5. After Town action, all plan amendments and rezones must be submitted to Winnebago County for approval.

Extraterritorial Platting and Zoning

State law provides for the review of any land division in a town that is in the extraterritorial area of an adjacent city and/or village by that city and/or village. Depending upon the location, the City of Neenah, Village of Fox Crossing, and Village of Greenville may have review authority over land divisions in the Town of Clayton. The extraterritorial boundary is shown on Map 9-1 Existing Land Use. State law also provides for an extraterritorial zoning ordinance in the extraterritorial area of an adjacent city and/or village. At this time, none of the communities mentioned have an interest in developing or adopting an extraterritorial zoning ordinance.

General Plan Implementation

Summary

The Town of Clayton Comprehensive Plan 2045 is intended to guide all decisions related to community development in the town. All public and private sector community development related decisions should be made in the context of the Plan's goals, objectives, policies and recommendations.

Specifically, the Plan should be used as a guide when site plans are reviewed, rezonings are proposed, conditional use requests are considered, subdivision plats are reviewed, and public utility improvements or extensions are proposed. The Plan should be used to evaluate the impact of proposed development projects on existing land uses, transportation system facilities, utility systems, park and recreation facilities and other municipal services and facilities prior to issuing permits to, for example, commence construction, divide land, and occupy buildings.

This section of the plan outlines a course of action for Town of Clayton officials to follow and implement over the next twenty years but focuses on those tasks which have been deemed a priority by the Plan Commission for completion over the next five (5) years. Implementation will comply with existing ordinances, or new ones will be adopted and implemented.

Integration of the Elements

With the high likelihood of continued growth in Clayton in the next twenty years, it will be especially important to keep in mind all the land use components when seemingly dealing with one. The blending of various styles and densities of residential development with commercial and industrial activity will be particularly important. Parks, trails, and open space will be a significant factor in achieving this harmony.

During the planning process, care was taken to ensure consistency between the goals, objectives, policies, and recommendations contained in each element of the Comprehensive Plan. The Town of Clayton Plan Commission will be responsible for comparing proposals for development that come before it with each element of the Comprehensive Plan. If the review of the development proposal uncovers inconsistencies between the elements, the Plan Commission shall analyze and determine how the inconsistencies may be resolved.

The Town of Clayton Plan Commission will be responsible for comparing all proposed development with each element of the comprehensive plan, including the natural environment (wetlands, high ground water and bedrock, and soil limitations for below grade septic systems). The Town will also consider implementation tools like land use ordinances and the Official Map to assure consistency of land use decisions with the Comprehensive Plan recommendations.

Ordinances, Programs and Specific Actions

Zoning Ordinance

Zoning has long been recognized as a fundamental tool in implementing a comprehensive plan, specifically the intentions of the Future Land Use Plan. The Town of Clayton took a significant step toward providing more local control over land use decisions by removing town wide zoning control through Winnebago County. On December 17, 2013, the Town developed and adopted The Town of Clayton Zoning Code of Ordinances. It should be noted that Winnebago County still maintains zoning control with shoreland areas (300' of a navigable street and 1000' from a lake or impoundment).

Shoreland-Wetland Zoning Ordinance

As noted earlier, the regulation of land use in shoreland and wetland areas is covered by the Shoreland District Overlay of the Winnebago County Zoning Ordinance. The Ordinance is administered and enforced by the Winnebago County Planning and Zoning Department. The regulations apply to areas within 1,000 feet of the ordinary high water mark of a lake, pond, or flowage, and 300 feet from the ordinary high water mark of a river or stream, or the landward side of the floodplain, whichever is greater.

Subdivision Ordinance

Wisconsin State Statutes Chapter 236 set forth the necessary requirements to divide land in the State. A subdivision ordinance establishes criteria, standards and guidelines for the orderly layout of streets, lots, open space areas and utility easements and other land division issues. The code also identifies how subdivisions relate to each other and public highways to ensure the importance of orderly planning in the town.

The Town of Clayton adopted a Subdivision Ordinance in September 2000 with a number of modifications being made over subsequent years. Residential development will occur in compliance with the ordinance.

Official Map Ordinance

State Statutes Chapter 62.23 allows the Town of Clayton Plan Commission to create and maintain an official map of the municipality. An Official Map shows present and proposed future roads, parks, trails, and public facilities. The law limits compensation to private property owners who construct buildings on designated future streets or public areas. The Town of Clayton has adopted an Official Map.

The purpose of official mapping is to promote the planning and preservation of future arterials and collector roadway corridors. A map showing future streets can be extremely helpful to the long range planning of a community and can alert property owners and developers to the intended route of major streets. As development occurs in the officially mapped corridors, the roadways will be allowed to deviate to some extent from the legally defined roadway to account for mapped wetlands or other geographic obstacles.

Other Ordinances

The Town of Clayton Plan Commission should lead a comprehensive review of all ordinances and move to codify into a full municipal code. The Town of Clayton also has the following ordinances and regulations:

- Road Access Control
- Road Design Standards
- Site Plan Ordinance
- Public Improvement Agreement
- Park Use Regulations
- Sign Ordinance

Measurement of Comprehensive Plan Effectiveness

The Town of Clayton Plan Commission may, on a periodic basis, provide a written report to the Town Board on the progress made in implementing the programs and actions described in the Implementation Element of the Comprehensive Plan.

Plan Update Process

The Town Plan Commission and the Town Board will review any changes suggested for the plan every other year. The Town will update the comprehensive plan no more often than every five years, but not more than ten.

5-Year Implementation Action Plan

Summary

The implementation of the Comprehensive Plan will need to occur through a variety of methods. The following summary of key objectives, strategies and recommendations are provided as a guide to establishing the parameters for new development within the Town over the next five years. As noted in several categories, significant changes to existing Town regulations will be necessary to achieve the vision established for the Town. The Town of Clayton Plan Commission should lead a comprehensive review of all ordinances and move to codify into a full municipal code.

Implementation Vision

The Town of Clayton Plan Commission developed the following vision statement pertaining to the implementation of the Comprehensive Plan:

The Town maintains an effective comprehensive plan and land development process that encourages orderly growth through the utilization of citizen participation, quality technical and professional staff, and an active Plan Commission. Planning and zoning are consistent, and long-term community planning goals are not sacrificed for short-term development. Design Standards for commercial, industrial, and multi-family uses are essential to achieve quality development. The Town's proactive code enforcement controls such things as junk cars, unscreened outdoor storage, illegal signs, litter, and similar blighting influences. The Town assumes responsibility for zoning controls assuring fair reviews, due process and proper interpretation of the codes.

INSERT COMPLETED IMPLEMENTATION TABLES HERE

