



City of Dover
Board of Adjustment
November 20, 2024
V-24-06

Title: Property at 207 N. West Street- Application for a Variance

Location: Northeast corner of N. West Street and Cecil Street

Address: 207 N. West Street, Dover, DE

Owner: 4BL, LLC

Tax Parcel: ED-05-076.08-02-01.00-000

Application Date: October 17, 2024

Present Zoning: RG-1 (General Residence Zone)

Present Use: Vacant Lot (previous residential dwelling demolished)

Proposed Use: Subdivision into four (4) lots for townhouse units (Cecil Street Townhouses)

Reviewed By: Dawn Melson-Williams, AICP, Principal Planner

Variance Type: Area Variance

Variances Requested: Request has been made for a Variances from the requirements of *Zoning Ordinance*, Article 4 §4.2 for a proposal to subdivide into four (4) townhouse lots. Variance Request 1 seeks a reduction of the minimum lot depth to 84.5 feet from 100 feet. And Variance Request 2 seeks to allow a minimum lot area of 2,366 SF reduced from the required minimum lot area of 3,000 SF for two (2) of the townhouse lots.

Project Description

The property at 207 N. West Street is located at the northeast corner of N. West Street and Cecil Street making it a corner lot. The east side of the property is bounded by an alley. Originally the property included a two-story dwelling that faced N. West Street with a curb cut off Cecil Street for access to a rear driveway and a garage structure in the rear near the alley. The dwelling was demolished (by the City) after it was declared a Dangerous Building by City Council due to its condition.

The parcel is approximately 84.50 feet in width and 144 feet in depth when looking at the previous positioning of the dwelling fronting on N. West Street. The new owner has presented a concept to redevelop the property and subdivide it into four (4) lots fronting on Cecil Street as townhouse units. A Conceptual Plan sheet shows the proposed subdivision proposal (See Exhibit F). Also included is a rendering of the proposed two-story townhouse units; see Exhibit G.

The Applicant has requested a Variance from the requirements of *Zoning Ordinance*, Article 4 §4.2 for a proposal to subdivide into four (4) townhouse lots. Variance Request 1 seeks a reduction of the minimum lot depth to 84.5 feet from 100 feet. And Variance Request 2 seeks to allow a minimum lot area of 2,366 SF reduced from the required minimum lot area of 3,000 SF for two (2) of the townhouse lots.

The subdivision of the existing parcel into four (4) lots would be subject to a separate Conditional Use Plan/Minor Subdivision Plan review process by application to the Planning Commission.

Property and Adjacent Properties: Zoning and Land Use

The 12,168 SF (0.279 acre) +/- property is zoned RG-1 (General Residence Zone). Generally, the area to east of North West Street is residential with several places of worship, small neighborhood commercial establishments, and a park. The area to the west of North West Street between the street and the railroad corridor is more industrial in nature. The adjoining parcels to the north and east (across the alley) are also residential in use and zoned RG-1. Across N. West Street to the west is zoned M (Manufacturing Zone). To the southwest is a parcel zoned M (Manufacturing Zone) and the Rail Haus property zoned C-2A (Limited Central Commercial Zone). To the south across Cecil Street, is a block zoned RG-1 (General Residence Zone) consisting of several places of worship and additional residences.

A Map Exhibit (Exhibit B) prepared by Staff is attached to this Report. It shows the subject property's location and the surrounding zoning. Map Exhibit C shows an aerial view of the area.

Code Citations

RG-1 (General Residence Zone)

The subject project area is zoned RG-1 (General Residence Zone). *Zoning Ordinance*, Article 3 Section 2 lists the permitted uses, conditional uses, and other provisions of the RG-1 zone. For the proposed redevelopment and subdivision of the property for townhouse units would require a Conditional Use Application with Subdivision Plan. See the following excerpt of the permitted uses in the RG-1 zone.

Article 3 Section 2. General residence zones (RG-1 and RG-2).

- 2.1 *Uses permitted.* In a general residence zone, no building or premises shall be used, and no building or part of a building shall be erected, which is arranged, intended or designed to be used, in whole or in part, for any purpose, except the following:
 - 2.11 Any use permitted in one-family residence zones.
 - 2.12 Garden apartments limited to placement within the RG-2 district only.
- 2.2 *Performance standards.* All uses are subject to performance standards as set forth in article 5, section 8.1.

2.3 *Site development plan approval.* Site development plan approval in accordance with article 10, section 2 hereof shall be required prior to the issuance of building permits for the erection or enlargement of all structures and related accessory structures. Such approval shall also be required prior to the issuance of certificates of occupancy for a change of use.

2.4 *Conditional uses.* The following uses are permitted, conditional upon the approval of the planning commission in accordance with the procedures and subject to the general conditions set forth in article 10, section 1:

- (a) Townhouses subject to the following restrictions:
 - i. No more than one dwelling unit shall be permitted upon a lot.
 - ii. No more than four dwelling units shall be permitted in a group of townhouses.
 - iii. Each group of townhouses shall be physically separated from another by no less than two dwelling units of a different housing type from other groups of townhouses on the same side of the street.
 - iv. Townhouse groups shall be designed to minimize points of access to the public street and to take access from an alley or other shared access where such access is available.
- (b) Duplex dwellings subject to the following restrictions:
 - i. No more than one dwelling unit shall be permitted upon a lot
 - ii. Duplex dwellings shall be designed to minimize points of access to the public street and to take access from an alley or other shared access where such access is available.
- (c) Bed and breakfast inns in the RG-1 district only, subject to the following:
 - i. A bed and breakfast inn may only be established within a primary residential structure or an associated accessory structure.
 - ii. The owner of the property shall reside on the premises of the bed and breakfast inn or in an adjacent premises. However, if ownership of the property is in the name of a corporation, partnership, trust, etc., a full-time resident manager/operator/inn-keeper shall reside in the principal structure on the subject property or adjacent property.
 - iii. The principal structure shall contain at least one full bathroom for the exclusive use of the owner or resident manager and other members of the immediate household. In addition, one full bathroom shall be provided for each two guestrooms. Each full bathroom shall contain a minimum of one water closet (toilet), one lavatory (sink) and one bathtub or shower stall and shall comply with all applicable building and plumbing codes.
 - iv. The number of guestrooms requested shall be set forth in the application for conditional use. The planning commission shall expressly establish the maximum number of guestrooms permitted for any application for which approval is granted. In no case shall a bed and breakfast inn contain more than ten guestrooms.
 - v. Off-street parking shall be provided at a minimum of two spaces, plus one space per guestroom. Off-street parking shall be prohibited in the front yard, except that such parking which may be customarily accommodated on a single width driveway may be permitted. Required parking may be provided on the premises or off the premises, provided that such off-premises parking is located within 150 feet walking distance of the bed and breakfast property.
 - vi. Lot coverage for a bed and breakfast inn shall not exceed 60 percent of the lot.
 - vii. Signage is limited to one sign not to exceed six square feet in area. Signs may be illuminated, provided that internally illuminated signs shall be prohibited.
 - viii. Meals may be served to residents and overnight guests only. No cooking appliances or kitchenettes shall be permitted within the guestrooms, except small refrigerators and microwave ovens.
 - ix. The stay of overnight guests shall be limited to 30 consecutive days.

- x. The owner/operator of a bed and breakfast inn shall maintain a current City of Dover business license, and the establishment shall be inspected by the City of Dover Fire Marshal and the City of Dover Health Inspector for compliance with all applicable life safety and health and sanitation codes.
- (d) Student homes subject to the following siting and bulk criteria:
 - i. No student home shall be located closer than 500 feet from any other student home.
 - ii. The maximum allowable occupancy shall be four persons or the occupancy limit as determined by the building and fire codes adopted by the City of Dover, whichever is less.
 - iii. Two off-street parking spaces shall be provided per dwelling unit.
 - iv. A student home shall not be permitted to be established within any semi-detached dwelling, duplex dwelling, group dwelling, or townhouse dwelling unit.
 - v. Buildings or groups of buildings on the same lot with 15 or more units on the lot shall not be subject to the student home regulations.
 - vi. Student homes shall be licensed under chapter 10, Housing Code [chapter 22, Buildings and Building Regulations], article V [X], Rental Dwellings, of the Code of Ordinances.
 - vii. Student homes shall be subject to the provisions of chapter 10, Housing Code [chapter 22, Buildings and Building Regulations], article III [VIII], Leases, of the Code of Ordinances.
- (e) Multiple dwellings limited to placement in the RG-2 district only.
- (f) Professional offices may be permitted on Governors Avenue between Water Street and Mary Street, and on Route 8, subject to the following restrictions:
 - i. The office operations shall be conducted in such a manner as to maintain the residential character of the surrounding neighborhood, and no changes or improvements shall be made to the premises which might preclude utilization of the premises for residential purposes in the future.
 - ii. There shall be no other professional office located in the same zoning district within 250 feet of the premises.
 - iii. No display of products or goods shall be visible from the street.
 - iv. There shall be no exterior effects such as noise, traffic, odor, dust, smoke, gas, fumes, radiation, or electromagnetic interference.
 - v. A minimum of two off-street parking spaces shall be required.
 - vi. No more than four off-street parking spaces shall be permitted. Furthermore, all off-street spaces shall be visually screened from adjacent residential uses, to the greatest extent possible, by employing a landscape screen no less than six and one-half feet high, which landscape screen shall be properly maintained throughout the duration of the professional office use on the subject premises.
 - vii. Signage shall be limited to one sign, not to exceed six square feet in area. No sign may be illuminated.
 - viii. The hours of operation shall not commence prior to 6:00 a.m. and shall cease no later than 8:00 p.m., with no more than four employees engaged in the operations upon the premises at any given time.
 - ix. The planning commission shall have the authority to impose such additional conditions and restrictions as may be necessary or appropriate to protect the general health, safety, and welfare of the residents of surrounding properties.
- (g) In order to stimulate limited commercial activity in the RG-1 and RG-2 zones within the city's historic district zone and/or where a historic district property or a property listed on the National Register of Historic Places exists, and to make this area of historic Dover more attractive to tourists and residents, antique shops, art galleries, gift and card shops, book stores, specialty hobby stores, and restaurants with no alcoholic beverages may be permitted as accessory uses incidental to the principal residence, subject to the conditional use approval of the planning commission in accordance with Article 10—Planning Commission, Section 1—Approval of conditional uses, and subject to the following:
 - i. Total floor area of any nonresidential accessory use shall not exceed 2,000 square feet.

- ii. A minimum of two off-street parking spaces shall be required to serve the residence and the accessory use.
- iii. Signage for the accessory use is limited to one sign not to exceed six square feet in area. Signs may be illuminated, provided that internally illuminated signs shall be prohibited.
- (h) Off-street parking.

In the RG-1 zone, there is a set of bulk standards for development outlined in *Zoning Ordinance*, Article 4 Section 4.2. It sets the lot depth for townhouse units at 100 feet and the minimum lot area at 3,000 SF. See code excerpt below; the lot depth and lot area requirements are highlighted (the subject of these variance requests).

Article 4 Section 4.2. [RG-1 zones].

Bulk and parking regulations for general residence zone (RG-1) are as follows (see also article 12, definitions; article 5, supplementary regulations; and article 6, off-street parking, driveways and loading facilities):

	One-Family Dwellings Detached	Duplex/One-Family Semi-Detached and Other Dwellings	Townhouses/One-Family Attached
Minimum required:			
Lot area (sq. ft.)	6,000	5,000	3,000
Lot width (ft.) per dwelling unit	50	25	20
Lot depth (ft.)	100	100	100
Front yard (ft.)	15	15	15
Minimum side yard (ft.)	5	10	10
Rear yard (ft.)	30	30	30
Off-street parking spaces/DU	1	1	1
Maximum permitted:			
Building height			
Stories	2½	2½	3
Feet	35	35	35
Lot coverage	45%	50%	60%

(Ord. of 12-14-1992; Ord. No. 2015-13, 10-12-2015)

Additionally, the following definitions are part of the *Zoning Ordinance*:

Dwelling, attached: A dwelling having one or more walls in common with another dwelling.

Dwelling, one-family: A permanent dwelling unit placed on a permanent foundation and designed and intended for use by only one family. One-family dwellings shall not include manufactured homes or mobile homes but shall include modular homes constructed to the standards of the Dover Code of Ordinances, Chapter 22—Buildings and Building Regulations.

Lot depth: The minimum distance from the street line of a lot to the rear lot line of each lot.

Lot width: The distance between the side lot lines of a lot or between the side lot line and the street line most nearly parallel to the side lot line for a corner lot, measured at the street line and setback line. For odd-shaped or triangular-shaped lots or lots fronting on cul-de-sac streets, the lot width measured at the street line may be reduced to not less

than one-half of the minimum lot width required for the zoning district. If the street line is a curved line, the lot width measurement shall be measured along the arch of the curved line.

Street: A street shown on the official map of the City of Dover and improved to the satisfaction of the planning commission.

Street line: The dividing line between a lot and a street.

Townhouse: A one-family, attached dwelling unit, with one dwelling unit from [the] ground to roof, having individual outside access.

Applicant's Proposed Project and Variances Requested

The Applicant has submitted a Plan Sheet (Exhibit F). This plan/drawing depicts the proposed series of lots for the four townhouse units and lists the minimum (code required) and proposed bulk standards in the RG-1 zone. The dimensions and lot area are given for each lot (Lots 1-4). The placement of each dwelling unit and associated driveways and sidewalks is also shown. The Applicant has requested Variances from the requirements of *Zoning Ordinance*, Article 4 §4.2 for proposal to subdivide into four (4) townhouse lots. Variance Request 1 seeks a reduction of the minimum lot depth to 84.5 feet from 100 feet. And Variance Request 2 seeks to allow a minimum lot area of 2,366 SF reduced from the required minimum lot area of 3,000 SF for two (2) of the townhouse lots.

The Applicant described the project as follows:

Project Background Information: The project is located at the corner of North West Street and Cecil Street within Dover city limits. The existing site of 12,168 square feet previously contained a single-family home with a detached shed and a large concrete parking area. The prior occupant passed away, the home fell into disrepair, and it was recently demolished by the City of Dover.

The proposed re-development of the site entails division into 4 lots. 1,70 +/- square foot, two story townhouses with one car garages will be constructed. The intent is to create homes for young families that are within their financial reach.

Exceptional Practical Difficulties Tests

Zoning Ordinance, Article 9 §2 dictates the specific powers and duties of the Board of Adjustment with regard to granting variances. Specifically, the Board must determine:

2.1 Variance – The board shall have the authority to authorize variances from provisions of the Zoning Ordinance that are not contrary to public interest where the board determines that a literal interpretation of the Zoning Ordinance would result in undue hardship or exceptional practical difficulties to the applicant. In granting variances, the board shall determine that the spirit of the Zoning Ordinance is observed and substantial justice is done.

2.11 Area Variance. A variance shall be considered an area variance if it relates to bulk standards, signage regulations, and other provisions of the Zoning Ordinance that address lot layout, buffers, and dimensions. In considering a request for an area variance, the board shall evaluate the following criteria and document them in their findings of fact:

- (a) the nature of the zone in which the property lies;
- (b) the character of the immediate vicinity and the contained uses therein;

- (c) whether, if the restriction upon the applicant's property were removed, such removal would seriously affect neighboring properties and uses; and
- (d) whether, if the restriction is not removed, the restriction would create unnecessary hardship or exceptional practical difficulty for the owner in his efforts to make normal improvements in the character of that use of the property that is a permitted use under the provisions of the Zoning Ordinance.

Review of Application

As part of the Application, the applicant was asked to summarize how the requested Variance relates to the above criteria. The applicant's responses (Exhibit D and Exhibit E) are provided in Exhibit D and listed below. More detailed statements are found in Exhibit E: Letter of November 8, 2024. Also listed is the Staff assessment of the application in accordance with the required criteria provided below.

1. The nature of the zone in which the property lies.

Applicant Response: The parcel is currently zoned RG-1 (General Residence Zone). The proposed use of townhouses is permitted as a conditional use.

Staff Response:

The subject property is zoned RG-1 (General Residence Zone). The RG-1 zoning district is a residential zoning district that allows for single family detached dwellings and other residential uses (duplexes, townhouses) and commercial type uses as conditional uses. The proposed use as a series of townhouse lots would be a conditional use. The RG-1 zone has bulk standards related to lot size and format and setbacks for placement of buildings on a parcel/lot.

2. The character of the immediate vicinity and the contained uses therein.

Applicant Response: The project lies on the fringe of Residential (RG-1) Zoning District to the east of North West Street, and Industrial/Manufacturing (M) to the west. The Senator Bikeway passes North/South on West Street. Immediately to the south is Mt. Carmel Church of the Living God. To the southwest is the Rail Haus Beer Garden and the former recycling center (now parking for the Rail Haus). To the west is Teal Construction's warehouse and equipment yard. To the north and east are single family residences in varying states of repair, generally trending toward improvement.

Staff Response:

The subject property at 207 N. West Street is a vacant lot after the previous dwelling and accessory structure were demolished. It is a corner lot fronting on two streets. The overall block is residential consisting of single family detached dwellings. Generally, the area to east of North West Street is residential with several places of worship, small neighborhood commercial establishments, and a park. The area to the west of North West Street between the street and the railroad corridor is more industrial in nature. The adjoining parcels to the north and east (across the alley) are also residential in use consisting of single family detached dwellings and zoned RG-1. Across N. West Street to the west is zoned M (Manufacturing Zone). To the southwest is a parcel zoned M

(Manufacturing Zone) and the Rail Haus property zoned C-2A (Limited Central Commercial Zone). To the south across Cecil Street, is a block zoned RG-1 (General Residence Zone) consisting of several places of worship and additional residences.

3. Whether, if the restriction upon the applicant's property were removed, such removal would seriously affect neighboring properties and uses.

Applicant Response: Allowing the 2 requested variances would not affect the use of neighboring properties. The new townhouses will be two-story units consistent with the height of existing residences. Sixteen of the properties to the north and east do not meet bulk standards for lot width and/or lot area as they pre-date the standards. The average lot area of the proposed lots exceeds the minimum lot area of the RG-1 District; therefore, a slightly "non-conforming" arrangement will not be out of character for the neighborhood. Granting of the variance will allow for four tasteful, well-constructed, affordable homes in an area that was recently dominated by vacant properties.

Staff Response:

Planning Staff notes that the existing parcel is larger when compared to surrounding parcels in the same block. With the reorientation of the lots to front on Cecil Street provides an opportunity for the parcel to be subdivided into a series of lots that would be more comparable in size to surrounding residential parcels. While most of the residential parcels front on the north/south streets such as N. West Street, North Kirkwood Street, etc. there are example of parcels fronting on and positioning the house to face the east/west street or short ends of the block. This lot configuration will result in the rear yards backing up to the side yard of the adjoining parcel to the north. This configuration and house position does exist on the north end of this block. The other nearby properties are separated from the subject parcel by the streets or the alley and therefore have a limited impact on those nearby properties. Therefore, the requested Variance should not impact the use of neighboring lands.

4. Whether, if the restriction is not removed, the restriction would create unnecessary hardship or exceptional practical difficulty for the owner in his efforts to make normal improvements in the character of that use of the property that is a permitted use under the provisions of the *Zoning Ordinance*.

Applicant Response: A lot of this size is somewhat out of character in relation to the neighboring homes. To justify the cost of the parcel after the demolition and fines were absorbed, a very large single-family home would need to be constructed to make the project viable. A large single-family home would be very imposing, and frankly, not marketable.

Per Chapter 11 of the Dover 2019 Comprehensive Plan-

Housing and Community Development

Goal 1: Encourage Balanced Housing Opportunities for all Residents of the City

Promote adequate, safe, and affordable housing for all residents in the City.

Recommendation 1: Encourage the Use of Mixed Housing Types

- Evaluate the provisions of the Planned Neighborhood Design and the Senior Citizen Housing Option for residential development.
- Continue to encourage compact and diverse residential development throughout the City.
- Re-evaluate all residential zones development requirements and housing types in the City.
- Evaluate and update Codes to encourage compact and diverse development throughout the City.
- Amend the provisions in the *Zoning Ordinance* for the definition of “family” to remove undue restrictions for members of protected classes.

Recommendation 2: Explore the Feasibility of Allowing Alternative Housing Units Options

- Develop zoning provisions to allow an accessory dwelling unit within one family residence zones for the use of family members.
- Develop zoning provisions for alternative housing options including group housing and transitional housing.

Recommendation 3: Encourage the Development of Affordable Housing

- Work with housing providers and developers to construct affordable rental housing options throughout the City including assessable housing for persons with disabilities.
- Work with housing providers to provide affordable housing to low income residents.
- Continue to work with housing providers to end homelessness and increase the number of permanent supportive housing for the homeless.

Recommendation 4: Promote Residential Development within the City

- Encourage mixed use of existing and new buildings.
- Encourage “in-fill” residential development.
- Encourage housing in the Downtown and other areas that are near transit and multi-modal routes, retail areas, employment and essential services.

The economics of providing affordable homes to working class families drives the need to divide the parcel. While a duplex configuration could be utilized, the opportunity to serve four families instead of two shouldn't be overlooked. The cost of building materials, mortgage rates, and groceries are taking the opportunity of home ownership off the table for Delawareans. Dividing the costs of the development, infrastructure, management and construction of the project by four will allow the homes to meet a price point that is reachable to young families.

Staff Response:

The Planning Staff notes that the size of this parcel presents an opportunity for subdivision into multiple lots and the RG-1 (General Residence Zone) allows for the development of the duplexes and townhouses through a Conditional Use review process. When creating new lots, the lots must comply with the bulk standards provisions. While it may be possible to create a series of lots for a set of duplex units or three townhouse units with the houses facing N. West Street, complete compliance with the setbacks, especially as related to a corner lot (two front yards) may be difficult and would likely result in narrow-width dwelling units and narrow backyard areas. The reorientation of the lots to face onto Cecil Street creates a more reasonable shaped lot for buildable areas and accommodation of off-street parking. The development of four dwelling units as townhouses offers a variety of housing types as infill development in this neighborhood. If these lots were already existing (created prior to 2007), the *Zoning Ordinance* includes provisions for administrative waivers of the bulk standards. Planning Staff finds that an exceptional practical difficulty may be determined to be present.

Variance Recommendations

Staff recommends approval of the Variances that would allow for a proposal to subdivide the parcel into four (4) townhouse lots to be considered. Variance Request 1 would allow a reduction of the minimum lot depth to 84.5 feet from 100 feet. And Variance Request 2 would allow a minimum lot area of 2,366 SF reduced from the required minimum lot area of 3,000 SF for the two (2) townhouse lots in the middle. The Planning Staff finds that the Applicant has strived to demonstrate an exceptional practical difficulty; they would incur by not having this Variance granted.

Staff recommends **approval** of the variance for reasons as follows:

- The *Zoning Ordinance* permits the development of several housing unit types (single family detached, duplexes, and townhouses) in the RG-1 zone.
- The reorientation of the lots to face onto Cecil Street creates a more reasonable shaped lot for buildable areas and accommodation of off-street parking.
- These changes to the bulk standards would be approved by Planning Staff to allow residential redevelopment if the lots already existed as the RG-1 zoning district includes provisions to address lot configurations that were platted before zoning regulations were established.
- For this redevelopment project of townhouse units and the subdivision of land, a Conditional Use Plan and a Minor Subdivision Plan applications will be required subject to the provisions of the *Zoning Ordinance*.

Advisory Comments to the Applicant

- If granted, the variance becomes null and void if work has not commenced within one (1) year of the date the variance was granted. At present there is no provision for extension.
- If the requested variance is granted, the Applicant must still obtain the appropriate Conditional Use Plan/Minor Subdivision Plan and construction activity Permits approvals for construction of any Buildings on the property. A Conditional Use Plan is required for the

development of a parcel for a townhouse unit in the RG-1 Zone; this is subject to application and review by the Planning Commission. A Subdivision Plan to divide the property into a series of lots requires an application and review process by the Planning Commission. Contact the Planning Office to discuss steps for application submission.

- The Applicant should be aware that whenever the Board of Adjustment denies an application for a variance, such application for a variance, or an application on the same property, which is substantially similar, shall not be accepted for reconsideration by the Board of Adjustment sooner than one year from the date of denial (*Zoning Ordinance*, Article 9 §3.8).

GUIDE TO ATTACHMENTS

Exhibit	Description/Author	# Pages
A	BOA Application Form	1
B	Zoning Map Exhibit (Staff)	1
C	Planning & Inspections View Map – Aerial Map Exhibit (Staff)	1
D	Applicant's Written Responses: Narrative	1
E	Supplemental Letter dated November 8, 2024 from Baird Mandalas Brockstedt & Federico, LLC (Attorney for Applicant)	1
F	Sheet BP-1: Board of Adjustment Plan for 207 N. West Street (Subdivision Plan Concept) prepared by Larson Engineering Group, Inc. dated 10/10/2024	1
G	Rendering of Two-Story Townhouses (Concept) provided by Applicant	1