VILLAGE OF HOMEWOOD

MEMORANDUM **DATE OF MEETING: November 12, 2026**

To: Planning and Zoning Commission

From: Noah Schumerth, Director of Economic and Community Development

Topic: Case 26-47: Text Amendment for Accessory Uses in Non-Commercial Places of Assembly

APPLICATION INFORMATION

APPLICANT	Village of Homewood
ACTION REQUESTED	Text amendment to allow the operation of a limited range of accessory uses (as special uses) within existing and previously approved non-commercial places of assembly.
ADDRESS	N/A
PIN	N/A

DOCUMENTS FOR REVIEW

Title	Pages	Prepared by	Date
Proposed Zoning Ordinance Language	28	Village of Homewood/Noah Schumerth, Director of Economic and Community Development	11/06/2026

ACTION REQUESTED

The Village of Homewood has prepared a proposal for a Village-initiated zoning text amendment, which would allow the operation of a limited number of accessory uses within existing and previously approved non-commercial places of assembly.

HISTORY

The Village has been approached by numerous places of worship and other non-commercial places of assembly since 2023 to convert underutilized building area into other uses. The number of requests received by the Village for this type of conversion in the past 12 months has increased. The most recent application received by the Village for such a use was a counseling office within an existing place of worship at 18328 Ashland Avenue in April 2026.

The Village has been reviewing possible changes to the Village Zoning Ordinance to allow for these types of conversions since June 2026. Staff provided a “first review” of this text amendment in September 2026. Staff reviewed comments from the Commission and made changes to the proposed text amendment. **Changes to the proposed text amendment are highlighted in yellow.**

BACKGROUND

In 2023, the Village created the "non-commercial places of assembly" use category to include a wide variety of uses where gatherings occur outside of a commercial purpose. The Village established use categories for both indoor and outdoor iterations of this type of use.

Indoor non-commercial places of assembly may include community centers, learning centers, clubs or lodges, exhibit halls, civic organizations, lodges, libraries, museums, municipal buildings, auditoriums, or religious institutions.

Many uses included in the indoor non-commercial place of assembly use category are seeing declining use, caused by a variety of trends:

- **Declining Religious Attendance/Participation:** Regular weekday attendance of worship services has dropped to approximately 30% nationally.

- **Digital Shifts:** Many religious or community uses are suffering from shifts toward digital activities and interactions, which have caused declining participation in events, clubs, or local programming.

- **Post-COVID Lifestyle Shifts:** Many gathering places, including clubs and religious uses, have seen declining regular in-person attendance since the COVID-19 pandemic.

- **Erosion of Third Spaces:** Many of the uses in this category, such as lodges/clubs and religious institutions, have been relied upon less and less as third spaces, especially as lifestyles shift and funding for these types of institutions are reduced.

Due to these changes, large amounts of space in the Village's existing indoor non-commercial place of assembly uses (especially places of worship and religious institutions) are vacant or underutilized. These spaces are often areas which were used for programming or services offered when participation and attendance for such uses were higher (such as child care facilities, schools, medical services, etc.). The owners of these facilities have approached the Village periodically to request assistance in finding uses for the space, which may allow for supplementary income or increases in attendance necessary to support the use and avoid closures.

Some examples of impacted uses with vacant/underutilized buildings or areas include:

- **First Presbyterian Church (17929 Gottschalk Avenue):** Closed in the early 2020s, the church has an 8,000 square-foot office building attached to the main sanctuary that is currently unused.

- **Salem Lutheran Church (18328 Ashland Avenue):** Closed in the early 2020s, the church has a large child care and office area which is not regularly used.

The Village prohibits the operation of indoor non-commercial places of assembly in commercial and industrial zoning districts. Indoor commercial places of assembly are *permitted uses* in all residential zoning districts when below 5,000 square feet in floor area, and are *special uses* in all residential zoning districts when greater than 5,000 square feet in floor area. The Village requires that any place of

assembly uses, including indoor non-commercial place of assembly uses, are located on collector or arterial streets (Section 44-04-04.(b)).

DISCUSSION

Proposed Amendment Language: The Village has proposed the following amendments to the Village Zoning Ordinance to allow limited opportunities for the operation of businesses or other uses within existing indoor non-commercial places of assembly.

- **New Zoning Category:** The proposed amendment would create a new use category in the Village Zoning Ordinance – *accessory office or personal service use* – which would mirror the existing *accessory retail or restaurant* use category. The *accessory retail/restaurant* use category is defined as follows:

  "Accessory retail/restaurant means the use of a portion of a building for retail purposes which are customarily incidental and subordinate to the principal use of the building."

  The new use category, *accessory office/personal service use,* is recommended to be defined as follows:

  "Accessory office/personal service means the use of a portion of a building for professional office, medical office, or personal service uses which are clearly incidental and subordinate to the principal use of the building. This term shall not include uses which provide contact with customers present, excluding direct appointment traffic, and shall be restricted to uses of limited scale and impact.

  This language combines current language for *accessory retail/restaurant* uses (to limit the scale of the use), and *home-based business* uses in residential zones (to limit the impact of the use).

- **Zoning Districts Permitted:** The proposed amendment would allow *accessory office/personal service uses* in all residential zoning districts where indoor non-commercial places of assembly are allowed, *as a special use.* All applications for an *accessory office/personal service use* would require Planning and Zoning Commission approval through the special use process.

  The proposed amendment would also allow *accessory office/personal service uses* in all commercial zoning districts as a *permitted use.* For legal non-conforming uses in commercial districts (such as non-commercial places of assembly/places of worship), the accessory use would not be permitted to continue if the principal use closed or ceased to operate. No legal non-conforming use may be expanded or increased in intensity to accommodate an accessory use.

- **Use-Specific Standards:** The proposed amendment would create the following use-specific requirements in Section 44-04-14 ("Accessory Use Standards"):

  - **Non-Residential Use:** *Accessory office/personal service* uses may not be located on a property where the primary use is a residential use. Office and personal service uses accessory to a residential property shall be considered *home-based businesses* and fall under the Village's requirements for such businesses.

- **No Exterior Signage: Any accessory office/personal service use in a residential zoning district may not have any permanent signage affixed to the exterior of the building depicting the accessory use.**

- **Fully Indoor:** The use shall be located fully interior to the principal use.

- **Floor Area Maximum: No *accessory office/personal service* use shall occupy more than 50% of the floor area of the principal use.**

Staff has provided the following additional analysis notes for this amendment:

- **No Municipal/Public Buildings:** The indoor non-commercial place of assembly use category includes municipal buildings and other public institutions. These uses are designed to be located in the PL-2 Public Land and Open Space zoning district, which is not included in the list of zoning districts where *accessory office/personal service uses* may be located.

- **Accessory Use: The new use category proposed is designated as an accessory use. Accessory uses are not permitted to operate when the principal use to which the use is accessory is no longer in operation. If a principal use closes, the accessory use must close.**

  Additionally, the new use category allows non-residential use in a residential zoning district. There are limited non-residential uses allowed in residential zoning districts – mainly non-commercial places of assembly and nature preserves. *Accessory office/personal services* uses may only be accessory to an indoor non-commercial place of assembly because all other uses permitted in residential zoning districts are either residential or outdoor uses where the use is not allowed.

Village staff have provided a copy of amended zoning ordinance text for review by the Planning and Zoning Commission.

Text Amendment Standards: Any text amendment, including Village-initiated text amendments, should be proposed in conformance with the text amendment standards in Section 44-07-10.(d).(2) of the Village Zoning Ordinance. Staff has provided a brief review of the proposed amendment against the Text Amendment Standards.

a. *Is the proposed text amendment consistent with the stated goals in the comprehensive plan?* The proposed text amendment allows a limited set of non-residential uses into residential zoning districts as uses accessory to non-commercial places of assembly. The Residential use category in the 1999 Comprehensive Plan encourages the creation of a limited set of uses which can support residential uses.

The 1999 Comprehensive Plan also states that the redevelopment and use of vacant property is a land use planning priority. This text amendment creates an opportunity for using vacant floor space within non-commercial places of assembly within Village limits.

b. *Does the proposed text amendment address a particular issue or concern for the village?* The proposed text amendment addresses concerns surrounding increasing vacancy and declining

use of existing non-commercial places of assembly. The text amendment may allow for existing non-commercial places of assembly to improve financial sustainability and mitigate the risk of large buildings with limited or no use within residential zoning districts. The amendment may allow for limited opportunities for uses which may serve residential zoning districts or visitors of indoor non-commercial places of assembly.

c. *Will the proposed text amendment impose an unreasonable hardship on existing uses?* The text amendment has been proposed to limit any impact on residential property in the vicinity of existing non-commercial places of assembly. Uses which may benefit from the proposed text amendment are unlikely to impose any hardships or undue impacts on surrounding property.

d. *Have major land uses, conditions or circumstances changed since the original zoning ordinance text was established?* The Village has seen a significant increase in the amount of vacant space within existing and operating non-commercial places of assembly, especially since the COVID-19 pandemic. Non-commercial places of assembly within the Village are seeing increasing financial pressures due to vacancy and declining use.

e. *Is the requested change compatible with the existing uses and development patterns of the community?* The proposed text amendment is written in a manner which is designed to limit the impact of any new uses on the existing uses, development pattern, or character of existing neighborhoods and the community more broadly.

f. *Will the proposed change be detrimental to the health, safety and welfare of the neighborhood or of the village as a whole?* The proposed text amendment is unlikely to impact the health, safety or welfare of neighborhoods or the Village as a whole.

STAFF COMMENTS

The Planning and Zoning Commission is a *recommending body* for any zoning text amendment. The Village Board of Trustees reserves the final authority to approve (or impose conditions on any approval) any zoning text amendment.

The Planning and Zoning Commission may recommend any changes to the proposed text amendment language prior to making a recommendation to the Village Board of Trustees. At the September 17, 2026 meeting of the Planning and Zoning Commission, the Commission recommended changes to the text amendments:

- **Commercial Zoning Districts:** The Commission asked for consideration of how non-commercial places of assembly in commercial zoning districts would be impacted by the text amendment. In particular, Commission members shared concerns about churches and other institutions with property in commercial zoning districts, who may not have the ability to add accessory uses to their property to reuse vacant or underutilized buildings on their property. **Staff reviewed potential impacts of adding accessory office/service uses as an accessory permitted use in commercial zoning districts. Staff recommends the addition of accessory office/personal service uses as permitted accessory uses in all commercial districts. Restrictions on legal non-conforming uses would still apply in any instance.**

- **Floor Area Maximum:** The Commission asked for review of the floor area requirement of 25% of the area of the principal use of the property, as this limit on floor area could restrict opportunities for the reuse of space in non-commercial places of assembly, especially when renovations or upgrades are needed to meet current building code requirements. **Staff recommended a change in this percentage to 50% of floor area. Greater than 50% could create a new principal use of the property. To be accessory, the use must be secondary and subordinate to the principal use.**

- **Inspections and Approvals:** The Commission requested clarity in how building code requirements would factor into the use of the property. **All accessory commercial uses still require meeting all applicable building codes for the building in which the use is to be located, including completion of all required inspections.**

RECOMMENDED PLANNING & ZONING COMMISSION ACTION

Staff recommends the following motion by the Planning and Zoning Commission, based on the findings outlined in this memo:

Recommend Village Board approval of Case 26-47: Zoning Text Amendment for Accessory Uses in Non-Commercial Places of Assembly, as proposed by the Village of Homewood in the draft zoning text attached with this recommendation.