



Date of Meeting: March 19, 2026

**TOWN OF LEESBURG**  
PLANNING COMMISSION WORK SESSION

**Subject:** Zoning Ordinance Rewrite

**Staff Contact:** Michael Watkins, Zoning Administrator  
Brian Boucher, Deputy Director  
James David, Director

**Purpose:** Wrapping Up PC Review and Input

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**Background:** At their July 20, 2023 Public Meeting, the Planning Commission received an introductory presentation on the Zoning Ordinance Rewrite project. In October 2023, representatives from Kendig Keast Collaborative (Consultant) presented their code audit of the Town's current Zoning Ordinance and broad recommendations for changes at a joint meeting of the Planning Commission and Town Council. In February and September 2024, the consultants delivered their first draft of the new Ordinance via the Town's enCodePlus online zoning platform and provided an overview of concepts in each Article to the Planning Commission. The first draft of the Zoning Ordinance Rewrite was released on March 6, 2025 for a 60-day public review period. The second draft of the Zoning Ordinance Rewrite was released on November 17, 2025 for a 45-day public review period. All Planning Commission and public presentations and the code audit are available on the Zoning Ordinance Rewrite project page at: [leesburgva.gov/zoningordinancerewrite](https://leesburgva.gov/zoningordinancerewrite).

**Issues:** The Planning Commission has held 20 work sessions on the draft Zoning Ordinance Rewrite since January 16, 2025. The draft is in good shape as a result of the Commission's work. The Commission submitted remaining comments, questions, or edits on or before the February 19, 2026 Work Session. The March 5, 2026 and March 19, 2026 meetings include staff responses to the remaining Commission comments.

**Public Comment Report and Responses**

Vice Chair McAfee noted the Public Comment Report as of November 17, 2025 had some valid concerns raised and asked for staff responses. The consultant and staff provided responses to all comments in Attachment 1. Each public comment and the corresponding staff or consultant response(s) are nested together as shown in the example below. Note there is a black bar that separates each comment and response grouping.

In many instances staff made corresponding changes to the Zoning Ordinance Rewrite based on the public comments. These changes will be reflected in the next Planning Commission Draft of the Zoning Ordinance Rewrite that is scheduled for public distribution on April 2, 2026.

### Excerpt from Public Comment Report with Staff Responses

#3877	Article III Use Regulations, Division 9 Use Table, Sec. 9-2 Use Tables
By: Morgan Hadlock Tags: public <a href="mailto:morgan@curatapartners.com">morgan@curatapartners.com</a> Date:12/31/2025	Home Occupation - Should this be permitted within the MU district? The standards are fairly stringent, and it seems that they should be permitted in districts that permit residential uses if the standards are met.
#3974	Article III Use Regulations, Division 9 Use Table, Sec. 9-2 Use Tables
By: Brian Mabry Tags: public,staff <a href="mailto:brian@kendigkeast.com">brian@kendigkeast.com</a> Date:3/10/2026	This has been added as a Limited Use to the Mixed Use District.

#### Follow Up on Adding CN Districts to Neighborhoods Located in the Northern Area of Town

Commissioner Tuck raised the idea of adding small planned Commercial Neighborhood (CN) areas into select residential neighborhoods in the northern area of Town to promote community grocery, convenience, and services areas. She clarified at the March 5, 2026 meeting that there was not a specific location in mind but rather a desire to address neighborhoods that do not have convenient grocery stores nearby.

**Staff response:** Staff took another look at the Zoning map and did not find a suitable location to create additional CN zoning in the northeast or northwest residential areas of Town. Staff does not recommend rezoning an existing Residential Suburban (RS) or Residential Medium (RM) parcel. These parcels already have housing on them and staff does not recommend making the change to commercial on an existing single family residential property.

Staff notes that some of the existing neighborhoods in the northern areas of Town did have commercially zoned parcels for neighborhood-serving uses at one point in the past. The market did not bear any commercial investment over time and in one instance the neighborhood ended up getting a church on the commercially zoned parcel and in another instance the neighborhood lobbied the Town to turn the commercially zoned parcel into residential. Also, it took almost twenty years for the Exeter strip retail center to materialize. These factors indicate that despite the efforts of the Town to allow for neighborhood commercial zoning in these neighborhoods the market did not strongly support that type of investment.

#### Additional Commissioner Comments

Commissioner Robinson met with staff the week of February 24<sup>th</sup> and raised several questions and concerns covering VA Code references, Legacy Districts, floodplain uses, parking ratios and credits, contiguous open space, “Utility, Major” and “Continuing Care Facility” use allowances, BAR authority, and validity periods for permits and entitlements. Staff’s notes on Commissioner Robinson’s comments followed by staff’s response are listed below:

1. Include VA Code References anywhere there is specific enabling language.

**Staff response:** This will be a large undertaking but staff will try their best to add State code references wherever feasible. Staff will prioritize adding State code references for Article VI, *Review and Approval Procedures*, which contains regulations that govern administrative decisions by staff and legislative decisions by the Planning Commission, Board of Architectural Review, and Council.

2. Make sure Legacy Districts and other old Zoning Ordinance language is accessible to the public.

**Staff response:** Staff will add all previous Zoning Ordinances in PDF format to the enCodePlus “Document Library” tab, and will link to the Revised 93 Zoning Ordinance enCodePlus site wherever Legacy Districts are discussed.

3. Sec. 5-5-1: Revise Table Note 5 to better articulate max building heights (can the BAR approve higher?)

**Staff response:** Table 5-5-1, *DT Lot and Building Standards*, Table Note 5, has been revised as follows: “Maximum building height may be reduced by the BAR in accordance with the H-1, Old and Historic District Design Guidelines.” This now clarifies that the BAR can only reduce building height and not increase it.

4. Sec. 5-7 and others: Cannot use floodplain for open space and recreation.

**Staff response:** Staff does not support eliminating open space and passive recreation uses from floodplain areas in Section 5-7, *Crescent District*, and other areas. It is common zoning practice to allow passive uses in floodplains and FEMA does not prohibit these types of uses and open spaces in floodplains.

5. Sec. 5-7.E.2: Eliminate on-street parking credits.

**Staff response:** Staff does not support eliminating on-street parking credits in the Crescent District. On-street parking credits are a carryover from the existing Crescent District zoning and staff has not observed many property owners utilizing the credit. Furthermore, on-street parking credits in the Crescent District implements Council direction for additional flexibility in the Zoning Ordinance.

6. Amenities/Open Space: These features must be contiguous to be credited towards the requirement.

**Staff response:** Standards for area, size, and shape of open space/amenity areas are included in the *Community Amenities and Open Space* standards. Staff does not support requiring open space and amenities to be contiguous since this is less flexible and could inhibit good design.

7. Sec. 5-7-6: Objected to “hazards.”

**Staff response:** The language related to “Natural Hazards” in Subsection 5-7-6, *Crescent District – Open Space and Parks*, has been removed.

8. Sec. 7-2: Remove the Gateway OLD.

**Staff response:** Staff still finds value in the Gateway Overlay District to implement the Town Plan goal of ensuring quality design compatible with Leesburg's historic, architectural, and tourist resources through architectural control along the Town's primary arterial routes into the H-1, Old and Historic Overlay District. Staff anticipates discussion on whether to keep the Gateway District may come up during Council review.

9. Sec. 8-1: No enhanced parking lot landscaping for credit.

**Staff response:** The following language was added to Section 8-1, *Community Amenities and Open Space Standards*: “Enhanced Parking Lot Landscaping. A maximum of 25 percent of a site's overall required amenity or open space can be satisfied by the installation of enhanced parking lot landscaping.”

10. Sec. 9-2-1: Remove water extraction.

**Staff response:** “Natural Spring Water Extraction and Bottling Operation” is not a permitted use in any commercial zoning district. It is included with the catch-all “All Agricultural Uses Other Than Listed” as a Special Exception use in the RS District. This is because old RE lots have been merged into RS, and there could be a large former RE parcel that could have natural springs.

11. Sec. 10-2-2: Remove Utility, Major from CS, MU, IC, and CD-PAC.

**Staff response:** The use “Utility, Major” has been eliminated in Mixed Use (MU) and Crescent District – Planned Activity Center (CD-PAC). It is a Special Exception use for Commercial Suburban (CS) and Innovation Center (IC). This provides an option, subject to review, and maintains flexibility for innovation in the marketplace.

12. Data Center: Can a standard be required to demonstrate where power is coming from?

**Staff response:** We are monitoring current proposed State legislation that supports localities seeking more information on a proposed data center’s resource impact. If the State code enables seeking more information on power distribution we can add this requirement in a future Zoning Ordinance batch amendment.

13. CCF: Number of bedrooms and independent living units exceeding underlying district density.

**Staff response:** The “Continuing Care Facility (CCF)” use and related standards were recently adopted by Council in 2023. Part of the effort was dialogue with industry representatives. They indicated that a CCF needed a certain level of density to be commercially viable, and they were comfortable with the density threshold included in the

Town’s Zoning Ordinance. Since Council gave direction that the Town needs CCFs to meet the needs of the community’s aging population, staff feels the density threshold should remain unchanged to ensure the viability of the use.

14. Drive-thru lanes, use of bank unrelated to principal use.

**Staff response:** The draft has been updated to include “Bank with Drive Through Facility,” “Restaurant with Drive-In or Drive Through Facility,” and “Pharmacy with Drive Through Facility” as the only uses that permit drive throughs.

15. More accommodation for parking personal-use commercial vehicles.

**Staff response:** Proposed parking ratios are based on The Parking Generation Manual published by the Institute of Transportation Engineers. It is an industry standard resource for estimating parking demand for various land uses. Staff does not support amending the parking ratios at this time.

16. Data center use standards should be revised to require two means of ingress/egress.

**Staff response:** Data centers are secured campuses accessed via a security booth. Staff does not feel requiring two means of ingress/egress is necessary since it is unclear what objective this will achieve.

17. Residential parking ratios are too low.

**Staff response:** The following table compares Leesburg draft parking ratios to other comparator jurisdictions. The table shows that Leesburg is in line with other localities.

Use	Leesburg	Vienna	Loudoun County	Virginia Beach
Multifamily - Studio	1.5/DU 1/DU (DI)	2/DU	1.25/DU	2/DU
Multifamily - 1 BR	1.5/DU 1/DU (DI)	2/DU	1.5/DU	2/DU
Multifamily - 2 BR	2/DU 1.5/DU (DI)	2/DU	2/DU	2/DU
Multifamily - 3 BR	2.5/DU	2/DU	2/DU	2/DU
Multifamily - 4 BR	2.5/DU	3/DU	2.5/DU	2/DU
Multifamily - 4+ BR	2.5/DU	4/DU	2.5/DU	2/DU
Single Family Attached	2/DU 1 guest per 5DU	No distinction between SFD and MF	3/DU	2/DU

18. School parking should be revised to require one space per employee and one space per 1,000 for elementary and middle schools and 5 per 1,000 for high schools.

**Staff response:** The parking ratios were updated in the draft based on input from the Loudoun County Public Schools (LCPS) Land Management Supervisor. He transmitted several memos and comments to the Planning Commission. Staff prefers keeping the draft school parking ratios in line with the needs of LCPS.

19. The BAR should be given authority to deny the location of parking spaces.

**Staff response:** The Old and Historic District Design Guidelines requires site designs to: “Locate driveways and parking to the side and/or rear of new and existing buildings (OHD Guidelines, Chapter IV.A.7).” This regulation enables the BAR to influence the location of parking spaces.

20. Off-site parking agreements should include language specifying how agreements can be revoked.

**Staff response:** The following language has been added to the “Off-Site Parking Agreement” regulations: “Revocation. The Zoning Administrator may revoke an off-site parking agreement for violation of this subsection, conditions of the agreement or approval, and all applicable Town or County codes, regulations, or ordinances. Notice of the revocation must be provided in writing by hand-delivery or certified mail, setting forth the reasons for the revocation, the date upon which the revocation is effective, and the appeals procedure. This provision shall not preclude the use of any other remedy prescribed by law with respect to violations of the provisions of this Zoning Ordinance.”

21. All references to quarter mile and 1,320 linear feet should be reconciled.

**Staff response:** The draft will be updated accordingly.

22. Reconcile 1,000 walking distance and the 500-foot distance from a municipal parking facility.

**Staff response:** Per 10/22/24 Council item, the 1,000-foot walking distance and 500-foot walking distance to a municipal parking facility stipulation has been removed from the *Modified [Parking] Requirements in the DT District* section for existing nonresidential buildings. The ZO Rewrite draft now reads: “Nonresidential. Where an existing building or structure is used or rehabilitated for any nonresidential use in the DT District, no parking spaces shall be required for any such building or structure.”

23. Insert a purpose statement regarding parking in-lieu ... these monies shall be used for the...

**Staff response:** The following language was added as a Purpose Statement for the *Payments in Lieu of Parking* section: “Purpose. Payments in Lieu of Parking provides flexibility in the Downtown where land is scarce and protection of historic resources is valued. Funds derived from such payments are deposited by the Town in a special parking fund and are intended for construction of additional off-street public parking spaces or facilities within the H-1, Old and Historic Overlay District. Payments in lieu shall not guarantee the availability of parking spaces in municipal facilities for a specific project.”

24. Create a table that illustrates the validity periods for permits, commission permits, special exceptions, and rezonings (including amendments thereto).

**Staff response:** The following table will be added to the draft:

Permit Type	Validity Period
Accessory Dwelling Unit	Expires upon cessation of the Accessory Dwelling Unit use
Appeals of Administrative Decisions	Remains valid unless otherwise amended by the BZA
Appeals of Proffer Interpretations	Remains valid unless otherwise amended by Town Council
Certificate of Appropriateness	Must be effectuated by an approved Zoning Permit within two years
Commission Permits	None, unless otherwise amended
Comprehensive Sign Plans	Remains Valid unless otherwise amended by owner
Demolition Permits	Must be effectuate within one year of approval
Family Day Home with six or more child	Expires upon cessation of the Family Day Home use
Home Occupation Permits	Validity subject to an annual renewal of a Business License
Interim Waivers	Remains valid unless otherwise amended by Town Council
Occupancy Permit	Regulated by Loudoun County through the Building Code
Sales Trailer	Expires upon the sale of the last dwelling unit
Short-Term Residential Rental	Subject to annual renewal
Sign Permits	Sign must be installed within one year
Special Exceptions	Must be effectuated by a Zoning Permit within Five years, Expires upon change in use or cessation of use for 2 or more years
Temporary Use Permits	As defined in the conditions of approval
Town Plan Amendments	Remains valid unless otherwise amended by Town Council
Trailer Permit	Valid through construction only
Variances	Remains valid unless otherwise amended by the BZA
Wall Check Plat	Remains valid
Written Zoning Determinations	Remain valid unless appealed within 30 days
Written Zoning Interpretations	Remain valid unless appealed within 30 days
Zoning Map Amendments (rezonings)	Remains valid unless otherwise amended by Town Council
Zoning Ordinance Modification	Remains Valid unless otherwise amended
Zoning Ordinance Text Amendments	Remains valid unless otherwise amended by Town Council
Zoning Permits	Must be effectuate within one year of approval

### Next Steps

The March 19, 2026 Planning Commission Meeting is another of many opportunities throughout the Zoning Ordinance Rewrite project for members of the Planning Commission and the public to provide input. The Council will hold a joint meeting with the Commission on April 2, 2026 to receive a summary of the draft Zoning Ordinance Rewrite, including highlights of the Planning Commission’s work and any additional recommendations. The Planning Commission’s public hearing on the Zoning Ordinance Rewrite is scheduled on April 16, 2026.

Barring any unexpected delays:

- Required public noticing for the April 16, 2026 public hearing on the Zoning Ordinance Rewrite will run in the local media on April 2, 2026 and April 9, 2026.
- A postcard will be mailed around April 2, 2026 to every property owner within the Town limits based on the County’s most recent tax assessment records.
- The Planning Commission Draft of the Zoning Ordinance Rewrite will be available to the public on April 2, 2026.

Tentative Planning Commission Zoning Ordinance Rewrite Work Plan

#	Topic	Commission Meeting Date
1	ZO Rewrite Work Plan	January 16, 2025
2	Zoning Map	February 6, 2025
3	Release of Draft Text	March 6, 2025
4	Article 1 General Provisions Article 2 Zoning Districts and Dimensional Standards	April 3, 2025
5	Article 3 Use Regulations	April 17, 2025
6	Article 3 Use Regulations (continued)	May 1, 2025
7	Article 3 Use Regulations (continued)	May 15, 2025
8	None	June 5, 2025
9	Recap Articles 1-3, Article 4 Development Standards	July 10, 2025
10	Article 5 Review Bodies, Article 6 Review Procedures	July 17, 2025
11	Article 7 Nonconformities, Article 8 Enforcement, Article 9 Word Usage	August 7, 2025
12	No Meeting	August 21, 2025
13	Recap Articles 4-9, Deep Dive List	September 4, 2025
14	Deep Dive List (continued)	September 18, 2025
15	Deep Dive List (continued)	October 2, 2025
16	Deep Dive List (continued)	October 16, 2025
17	Placeholder Sections, Public Comment Report	November 6, 2025
18	Crescent District, Public Comment Report	November 20, 2025
19	Subcommittee Recommendations: Attainable Housing, Signs	December 4, 2025
20	No Meeting	December 18, 2025
21	Questions/comments on ZO Rewrite Draft II, CD-AC Test Results	January 15, 2026
22	Questions/comments on ZO Rewrite Draft II, Travel Demand Model	February 5, 2026
23	Final questions/comments on ZO Rewrite Draft II, Additional Review of Residential Densities	February 19, 2026
24	Staff responses to Commissioner questions	March 5, 2026
25	Staff responses to Commissioner questions	March 19, 2025
26	Joint PC-Council Meeting	April 2, 2026
27	Public Hearing	April 16, 2026

**Attachment:**

1. Public Comment Report with Staff Responses (as of November 17, 2025)