


CITY ATTORNEY'S OFFICE

OAKLAND CITY COUNCIL

ORDINANCE NO. _____ C.M.S.

AN ORDINANCE, AS RECOMMENDED BY THE PLANNING COMMISSION:

(1) AMENDING TITLE 17 OF THE OAKLAND MUNICIPAL CODE (THE PLANNING CODE) TO (A) AMEND CHAPTER 17.96 S-14 HOUSING SITES COMBINING ZONE TO UPDATE THE DEFINITION OF DEVELOPMENT PROJECT AND TO INCLUDE A CONDITIONAL USE PERMIT PROCEDURE FOR NON-HOUSING DEVELOPMENTS; AND (B) UPDATE “WORK/LIVE” AND “LIVE/WORK” RESIDENTIAL TO NON-RESIDENTIAL UNIT AREA, AS REFERENCED THROUGHOUT TITLE 17, TO CORRESPOND WITH REVISION TO THE CALIFORNIA BUILDING CODE AND OAKLAND BUILDING CODE REGULATIONS; AND

(2) MAKING APPROPRIATE CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS.

WHEREAS, on January 31, 2023, the Oakland City Council adopted Resolution No. 89565 C.M.S., adopting the 2023-2031 Housing Element as a general plan amendment to the Oakland General Plan; and

WHEREAS, the 2023-2031 Housing Element includes a program, referred to as the Housing Action Plan, that sets forth a schedule of actions during the 2023-2031 planning period that the City is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element; and

WHEREAS, on October 3, 2023, the Oakland City Council adopted Ordinance No. 13763 C.M.S., amending the Oakland Planning Code to among other things create a new S-14 Housing Sites Overlay Zone; and

WHEREAS, the purpose of the S-14 Housing Sites Overlay Zone is to facilitate production of housing on sites identified by the City to meet its Regional Housing Needs

Allocation (RHNA) pursuant to the 2023-2031 Housing Element to prioritize sites within the S-14 Zone to be developed with residential uses; and

WHEREAS, the S-14 Housing Sites Overlay Zone has helped to provide streamlined development review but may also be serving as a constrain on the activation of vacant or minimally developed parcels in the City; and

WHEREAS, City staff met with California Housing and Community Development staff prior to presenting this proposal and received confirmation from the Department that the proposal to add a conditional use permit process supported by findings that include a no net loss or surplus site determination is consistent with the City of Oakland 2023-2031 Housing Element; and

WHEREAS, the State 2025 Edition of the California Model Building Construction Code, which went into effect on January 1, 2026 with local amendments adopted by City Council on September 15, 2025 by Ordinance No. 13861, includes requirements that nonresidential areas of live/work units not exceed fifty percent of the area of each unit; and

WHEREAS, the Oakland Planning Code currently includes work/live and live/work development standards that provide for varying amounts of residential and non-residential floor area, some of which are inconsistent with the California Building Code standards;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF OAKLAND DOES ORDAIN AS FOLLOWS:

SECTION 1. Recitals. The City Council finds and determines the foregoing recitals to be true and correct and an integral part of the City Council’s decision and hereby adopts such recitals as findings.

SECTION 2. Amendment of the Oakland Planning Code. The Oakland Planning Code (Title 17 of the Oakland Municipal Code) is hereby amended pursuant to *Exhibit A* and *Exhibit B* attached hereto and incorporated by reference herein. Additions to the Oakland Planning Code are shown as underline and deletions are shown as ~~striketrough~~.

SECTION 3. Administrative Regulations. Consistent with the recommendation of the Planning Commission, the City Administrator or their designee is hereby authorized and directed to promulgate administrative guidelines or a zoning bulletin to describe to the public the standards that must be met to satisfy the use permit criteria described in Planning Code Chapter 17.96.

SECTION 4. California Environmental Quality Act. The proposed amendments to the Planning Code rely on the following California Environmental Quality Act (CEQA) findings: (1) a determination that no further environmental review is required following the certified Oakland 2045 General Plan Update - Phase 1 Environmental Impact Report and Downtown Oakland Specific Plan Environmental Impact Report pursuant to Public Resources Code section 21166 and CEQA Guidelines Section 15162 or 15163; (2) this proposal is exempt pursuant to CEQA Guidelines section 15183 (projects consistent with General Plan and zoning); and (3) this proposal

is exempt pursuant to CEQA Guidelines Sections 15061(b)(3) (general rule, no significant effect on the environment). Each of these findings provide a separate and independent basis for CEQA clearance and when viewed collectively provide an overall basis for CEQA clearance.

SECTION 5. Filing of Notice of Exemption/Notice of Determination. The Environmental Review Officer shall file a Notice of Exemption/Notice of Determination with the appropriate agencies.

SECTION 6. No Conflict with Federal or State Law. Nothing in this Ordinance shall be interpreted or applied so as to create any requirement, power, or duty in conflict with any Federal or State law.

SECTION 7. Necessary to Serve Public Interest. This Ordinance serves the public interest and is necessary to protect the health, safety, and/or general welfare of the residents of Oakland and is enacted pursuant to the City of Oakland’s general police powers, Section 106 of the Charter of the City of Oakland, and Article XI, Section 5 and 7 of the California Constitution.

SECTION 8. Severability. If any section, subsection, sentence, clause or phrase of this Ordinance is for any reason held to be invalid or unconstitutional by decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of the Chapter. The City Council hereby declares that it would have passed this Ordinance and each section, subsection, clause or phrase thereof irrespective of the fact that one or more other sections, subsections, clauses or phrases may be declared invalid or unconstitutional

SECTION 9. Effective Date. This ordinance shall become effective immediately upon final adoption if it receives six or more affirmative votes; otherwise, it shall become effective upon the seventh day after final adoption.

IN COUNCIL, OAKLAND, CALIFORNIA,

PASSED BY THE FOLLOWING VOTE:

AYES - BROWN, FIFE, GALLO, HOUSTON, RAMACHANDRAN, UNGER, WANG, AND
PRESIDENT JENKINS

NOES –

ABSENT –

ABSTENTION –

ATTEST: _____
ASHA REED
City Clerk and Clerk of the Council of the
City of Oakland, California

NOTICE AND DIGEST

AN ORDINANCE, AS RECOMMENDED BY THE PLANNING COMMISSION:

(1) AMENDING TITLE 17 OF THE OAKLAND MUNICIPAL CODE (THE PLANNING CODE) TO (A) AMEND CHAPTER 17.96 S-14 HOUSING SITES COMBINING ZONE TO UPDATE THE DEFINITION OF DEVELOPMENT PROJECT AND TO INCLUDE A CONDITIONAL USE PROCEDURE FOR NON-HOUSING DEVELOPMENTS; AND (B) UPDATE “WORK/LIVE” AND “LIVE/WORK” RESIDENTIAL TO NON-RESIDENTIAL UNIT AREA, AS REFERENCED THROUGHOUT TITLE 17, TO CORRESPOND WITH REVISION TO THE CALIFORNIA BUILDING CODE AND OAKLAND BUILDING CODE REGULATIONS; AND

(2) MAKING APPROPRIATE CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS.

This Ordinance serves to amend Oakland Municipal Code Chapter 17.96 to add a conditional use permit procedure and no net loss/surplus sites findings for non-residential projects located in the Housing Sites Combining Zone, and to add new uniform standards consistent with the Oakland Building Code for residential and nonresidential floor area in work/live and live/work units. The Council also found that the above actions are exempt from the California Environmental Quality Act.

Exhibit A:

Planning Code Amendments to Chapter 17.96 S-14 Housing Sites Combining Zone Regulations

The Oakland Planning Code (Title 17 of the Oakland Municipal Code) is proposed to be amended as follows. Additions are shown in underline and deletions are shown in ~~striketrough~~.

17.96.010 Title, purpose and applicability.

The provisions of this Chapter shall be known as the S-14 Housing Sites Combining Zone Regulations. The Housing Sites Combining (S-14) Zone is intended to facilitate housing production on those sites that the City identified for housing pursuant to the 2023-2031 Housing Element. The S-14 Combining Zone seeks to ensure that sites within the S-14 Zone are developed with residential uses prioritized for residential development; and that projects that contribute toward meeting Oakland's needs for lower income housing receive By Right Residential Approval (as defined in Oakland Planning Code Section 17.09.040).

These regulations shall apply in the S-14 Combining Zone and where so stated herein shall supersede the regulations applying in the underlying zoning district with which the S-14 Zone is combined. Notwithstanding, for any parcel where the maximum allowable density of the underlying zoning district is less than the Realistic Capacity designated for the site as shown in the Housing Sites Inventory, then the underlying zoning district shall may control as described in Section 17.96.050.C.

17.96.020 Definitions.

The following definitions shall apply to this Chapter only.

Development Project. “Development Project” shall mean the process of changing the character of the land from its existing condition by: (1) constructing a fixed-foundation building or buildings on the land; by (2) demolishing an existing building or buildings and constructing a new fixed-foundation building or buildings on the land; or by (3) adding floor area to an existing building that is occupied by a business established in that building after January 1, 2026 where the square footage of the building is increased by fifty percent (50%) or more than thirty thousand (30,000) square feet, whichever is less reusing through major physical alteration, an existing building or buildings for purposes other than the purpose for which it was originally built or designed. Development Project does not include the making of improvements, renovations, or updates to an existing building; adding floor area to an existing building that is occupied by a business established in that building on or before January 1, 2026; or the placement of temporary structures, or the physical alteration, other than fixed foundation building construction, of the property outside of an existing building envelope.

Housing Sites Inventory. "Housing Sites Inventory" shall mean those sites listed in Tables C-5a, C-5b, and C-26 (Sheets "Table A" and "Table B") included in Appendix C of the City of Oakland 2023-2031 Housing Element, as may be amended.

Majority Residential Use. "Majority Residential Use" shall mean a use consisting of residential units only, mixed use developments consisting of residential and non-residential uses with at least two-thirds ($\frac{2}{3}$) of the square footage designated for residential activity, or transitional or supportive housing.

Prior Housing Element Sites. "Prior Housing Element Sites" shall mean those sites included in the Housing Sites Inventory and also included in the previously adopted 2007-2014 or 2015-2023 Housing Elements, as identified in column O of Table C-26 of the City of Oakland 2023-2031 Housing Element as either "Used in Prior Housing Element - Non-Vacant" or "Used in Two Consecutive Prior Housing Elements - Vacant."

Realistic Capacity. "Realistic Capacity" shall mean the projected residential development capacity, stated in terms of total probable number of dwelling units, capable of being achieved on the sites identified in the Housing Sites Inventory.

If the site is included in Sheet "Table A" of Table C-26, then the Realistic Capacity is identified in column S, "Total Capacity."

If the site is included in Table C-5a, Table C-5b, or Sheet "Table B" of Table C-26, then the Realistic Capacity is the sum total of columns identifying the capacity of Extremely Low Income, Very Low Income, Low Income, Moderate Income, and Above Moderate Income, expressed as total dwelling unit count.

Where a site is designated in the Housing Sites Inventory as part of a consolidated site grouping, with the Realistic Capacity listed on only a subset of the consolidated sites, the Realistic Capacity for the site shall be proportional to the parcel size compared to the aggregated parcel size for the associated consolidated sites, rounded to the nearest whole number.

17.96.030 Zones with which the S-14 Zone may be combined.

The S-14 Zone may be combined with any other zone. The S-14 Combining Zone shall apply to all parcels identified in the Housing Sites Inventory, with specified sections applicable to Prior Housing Element Sites.

The City shall maintain a mapping resource of parcels included in the Housing Sites Inventory, including Prior Housing Element Sites, that will be available to the public. However, the Housing Sites Inventory included in the 2023-2031 Housing Element shall be the definitive source for determining whether a parcel is included within the S-14 Combining Zone.

17.96.040 Required Majority Residential Use.

A. All Development Projects proposed in the S-14 Combining Zone must be a Majority Residential Use unless it complies with subsection B below or it receives a Conditional Use Permit pursuant to subsection C below. For purposes of determining Majority Residential Use, only newly proposed Floor Area, and not existing Floor Area that will remain on the project site, will be considered.

Any Development Project proposed in the S-14 Combining Zone not providing a Majority Residential Use complying with this section shall not be permitted.

B. ~~Notwithstanding the above, a~~ **A.** Development Project proposed in the S-14 Combining Zone that is not a Majority Residential Use may be permitted if the applicant can demonstrate one of the following:

A. **1.** The proposal includes a total residential unit count that equals no less than one hundred percent (100%) of the Realistic Capacity designated for the site as shown in the Housing Sites Inventory;

B. **2.** The proposal is a non-residential development that is coordinated with the development of a site under the same ownership that is within one-fourth (1/4) mile of the proposed development's site and that when the square footage of both developments are considered together meets the definition of a Majority Residential Use. For purposes of this section, "coordinated" shall mean that the Realistic Capacity applicable to the non-residential development will be applied to the newly identified site for purposes of determining minimum densities under Section 17.96.050, and the developer of the proposed non-residential development has either applied for planning entitlements for the residential development or has entered into an agreement, provided to the City, for partnered housing with a residential developer. Such agreement shall identify the Realistic Capacity and minimum density for the site and identify how the non-residential developer will contribute to affordable housing. The development standards applicable to the residential site must be sufficient to accommodate the applied Realistic Capacity. Affordable housing may be contributed by the non-residential developer through the donation of the property to the residential developer or through a cash payment to the residential developer that shall be used toward the cost of constructing the residential project. If a building permit has not been issued for the residential development, the City may withhold issuance of building permits for the non-residential development until building permits for the residential development are issued. If the residential development does not commence construction, the City may withhold certificates of occupancy for the non-residential development until the construction of the residential development is commenced.

C. **3.** The proposal is a use on government-owned property that is not a disposition under the Surplus Lands Act or that is otherwise exempt from the Surplus Lands Act.

Notwithstanding Section 17.96.050, such uses are also exempt from minimum residential density requirements.

D. 4. The proposal is an Emergency Shelter Residential Activity and/or Emergency Housing Facility permitted pursuant to Section 17.07.060.A.

C. A Development Project proposed in the S-14 Combining Zone that is not a Majority Residential Use and does not meet the requirements of either Subsection A or B above shall only be permitted upon the granting of a Conditional Use Permit (see CUP procedure in Chapter 17.134). In addition to the CUP criteria contained in Section 17.34.050, this CUP shall be granted only if the Development Project conforms to both of the following use permit criteria:

1. The proposal will provide a substantial economic or community benefit to the surrounding neighborhood; and

2. The remaining sites identified in the City of Oakland Housing Element are adequate to accommodate the City's remaining share its regional housing need for the 2023-2031 Housing Element cycle. This finding shall be consistent with the No Net Loss finding provided in California Government Code Section 65863. The finding shall include a quantification of the City's progress toward housing production during the 2023-2031 Housing Element cycle, the remaining unmet need for the City's share of the regional housing need at each income level, and the remaining realistic capacity of sites identified in the Housing Element to accommodate that need by income level.

17.96.050 Minimum densities.

All Development Projects proposed in the S-14 Combining Zone must comply with the minimum residential density requirements described in this section. Any project proposed in the S-14 Zone not providing the minimum required residential density and **not otherwise exempt from the majority-residential use requirement** shall not be permitted.

A. Except as provided under Subsections 17.96.050.B and 17.96.050.C, all Development Projects proposed in the S-14 Combining Zone shall include a residential unit count that equals no less than seventy percent (70%) of the Realistic Capacity designated for the site as shown in the Housing Sites Inventory.

B. A proposed Development Project in which one hundred percent (100%) of the residential units are reserved for moderate-, low-, and very low-income households, other than manager's units, shall include a residential unit count that equals no less than fifty percent (50%) of the Realistic Capacity designated for the site as shown in the Housing Sites Inventory.

C. Where a conflict exists between the minimum residential density standards set forth in the S-14 Combining Zone and the underlying zoning district, the Development Project

shall include a residential unit count that equals no less than ninety percent (90%) of the maximum density permitted in the underlying zoning district. If the underlying zoning district does not permit Permanent Residential Activities, then the requirements of this Chapter 17.96 shall not apply.

17.96.060 By Right Residential Approval for Prior Housing Element Sites.

If a project is proposed on a Prior Housing Element Sites parcel and at least twenty percent (20%) of the project's units will be made available to lower-income households, the project shall be eligible for By Right Residential Approval, as defined in Oakland Planning Code Section 17.09.040.

17.96.070 By Right Residential Approval for Sites not used in Prior Housing Elements.

If a project is proposed on a parcel included in the Housing Sites Inventory and is not a Prior Housing Element Sites parcel, the project shall be eligible for By Right Residential Approval if the project proposes at least as many lower- and moderate-income units as shown in the Housing Sites Inventory, the project overall proposes at least as many total units as described as the Realistic Capacity for the parcel (or where a conflict exists between the Realistic Capacity described for the parcel and the underlying zoning district, at least ninety percent (90%) of the maximum density permitted in the underlying zoning district), and the project satisfies at least one of the following conditions:

- A. At least twenty percent (20%) of the total housing units are restricted to very low-income households; or
- B. At least twenty-five percent (25%) of the total housing units are restricted to any combination of very low- and lower-income households; or
- C. At least forty percent (40%) of the total housing units are restricted to any combination of very low-, low-, and moderate-income households.

Notwithstanding the above, a project shall not be eligible for By Right Residential Approval under this section if the project proposes development in phases or proposes more than one hundred thousand (100,000) square feet of new floor area, unless one hundred percent (100%) of the housing units, other than manager's units, are restricted to very low-, low- and moderate-income residents.

Exhibit B:

Planning Code Amendments to Work/Live Units and Live/Work Units Sections of Chapters 17.65, 17.73, 17.101E and 17.101K of the Planning Code to Correspond with Building Code Updates.

The Oakland Planning Code (Title 17 of the Oakland Municipal Code) is proposed to be amended as follows. Additions are shown in underline and deletions are shown in ~~striketrough~~. Note that only the relevant code subsections being amended are included and unamended portions of tables are omitted.

Chapters:

Title 17 Planning

Chapter 17.65 HBX HOUSING AND BUSINESS MIX COMMERCIAL ZONES REGULATIONS

17.65.150 Special regulations for HBX Work/Live units.

17.65.160 Special regulations for HBX Live/Work units.

Chapter 17.73 CIX, IG AND IO INDUSTRIAL ZONES REGULATIONS

17.73.040 Special regulations for Work/Live units in the CIX, IG, and IO Industrial Zones.

Chapter 17.101E D-CE CENTRAL ESTUARY DISTRICT ZONES REGULATIONS

17.101E.070 Special regulations for D-CE Work/Live Units.

Chapter 17.101K D-DT DOWNTOWN DISTRICT ZONES REGULATIONS

17.101K.070 – Special Regulations for D-DT-Work/Live Nonresidential Facilities.

Chapter 17.65 HBX HOUSING AND BUSINESS MIX COMMERCIAL ZONES REGULATIONS

17.65.150 Special regulations for HBX Work/Live units.

E. Each new HBX Work/Live unit shall qualify as at least one of the following Unit Types:

Unit Type	Maximum residential floor area (percent of total floor area)	Special requirements	Separation between residential and nonresidential floor area
Type 1	One-third 50 percent	In the HBX-4 Zone, all remaining floor area to be used for the primary Nonresidential Activity.	Nonresidential floor area and residential floor area shall be located on separate floors (including mezzanines), or be separated by an interior wall (see Note 1, below, for an exception for kitchens).
Type 2	45 percent 50 percent	There must be two entrances into the ground floor units - one adjacent to the residential space and the other adjacent to the nonresidential space; the nonresidential ground floor entrance must be clearly designated as a business entrance separate from the residential entrance and be directly accessible by the public.	Nonresidential floor area and residential floor area shall be located on separate floors (including mezzanines), or be separated by an interior wall (see Note 1, below, for an exception for kitchens).
Type 3	55 percent	1. The majority of the nonresidential floor area for the ground floor units must be at a public street level and directly accessible to the street; and 2. The ground floor units must have a clearly designated business entrance.	Nonresidential floor area and residential floor area shall be located on separate floors (including mezzanines), or be separated by an interior wall (see Note 1, below, for an exception for kitchens).

Notes:

1. In Types 1, 2, and 3, a kitchen may be open to nonresidential floor area if it is adjacent to and directly accessible from residential floor area or stairs that lead to residential floor area. Counters, cabinets, sink and appliances and the floor area that is four (4) feet in front of these items shall be considered residential floor area.

2. Except as indicated for the HBX-4 Zone, see Section 17.102.190 for

regulations regarding converting facilities originally designed for industrial or commercial occupancy to Joint Living and Working Quarters.

17.65.160 Special regulations for HBX Live/Work units.

E. The amount of floor area in an HBX Live/Work unit designated for and devoted to residential is not restricted but the portion dedicated to nonresidential is subject to Building Code requirements.

Chapter 17.73 CIX, IG AND IO INDUSTRIAL ZONES REGULATIONS

17.73.040 Special regulations for Work/Live units in the CIX, IG, and IO Industrial Zones.

F. A Work/Live unit shall consist of a maximum of one third (1/3) fifty percent (50%) residential floor area with the remaining fifty percent (50%) floor area to be used for the primary Nonresidential Activity. All required plans for the creation of Work/Live units shall: (1) delineate areas designated to contain Residential Activities and areas designated to contain Nonresidential Activities, and (2) contain a table showing the square footage of each unit devoted to Residential and Nonresidential Activities.

Chapter 17.101E D-CE CENTRAL ESTUARY DISTRICT ZONES REGULATIONS

17.101E.070 Special regulations for D-CE Work/Live Units.

E. Table 17.101E.07 below describes the different types of D-CE Work/Live units. Each new Work/Live unit shall qualify as at least one of the following Unit Types:

Table 17.101E.07 Definitions of the Different Types of D-CE Work/Live Units

Unit Type	Maximum residential floor area	Special requirements	Separation between residential and nonresidential floor area	Additional Regulations
Type 1	<u>One third</u> <u>50 percent</u>	All remaining floor area to be used for the primary Nonresidential Activity.	Nonresidential floor area and residential floor area shall be located on separate floors (including mezzanines) or be separated by an interior wall. (see Note 2, below, for an exception for kitchens)	1, 2, <u>3</u>
Type 2	50 percent	1. At least <u>75%50%</u> of the ground floor must be dedicated to nonresidential floor area; and	Nonresidential floor area and residential floor area shall be located on separate floors (including mezzanines), or be separated by an interior wall. (see Note 2, below, for an exception for kitchens).	1, 2, 3

		2. The ground floor must be directly accessible to the street and have a clearly designated business entrance.		
--	--	--	--	--

Additional Regulations for Table 17.101E.07:

1. All required plans for the creation of D-CE Work/Live units shall: (1) delineate areas designated to contain Residential Activities and areas designated to contain Nonresidential Activities, and (2) contain a table showing the square footage of each unit devoted to Residential and Nonresidential Activities.
2. For Work/Live in D-CE-3 and D-CE-4 Zones, a kitchen may be open to non-residential floor area if the kitchen is adjacent to and directly accessible from residential floor area or stairs that lead to residential floor area. In these kitchens not separated by an interior wall, the kitchen is only required to be separated from the nonresidential floor area by a partition that can be opened and closed.
3. Each D-CE-3 and D-CE-4 Work/Live unit shall contain no more than one (1) fully equipped kitchen. A D-CE-3 and D-CE-4 Work/Live unit may contain a second sink and counter to serve the nonresidential floor area.

Chapter 17.101K D-DT DOWNTOWN DISTRICT ZONES REGULATIONS

17.101K.070 – Special Regulations for D-DT-Work/Live Nonresidential Facilities.

E. ~~At least two-thirds~~ Fifty percent (50%) of each unit shall be designated for working activities. Working and living activities shall be designated according to the following requirements:

1. In unpartitioned kitchens or work areas that include kitchen fixtures and appliances, the following areas are considered living space: the counters, cabinets, eating space, sink and appliances in the area that will function as a kitchen and the floor area that is four (4) feet in front these items.
2. If there is only one bathroom, half the bathroom shall be counted as living space and half shall be counted as workspace. Otherwise, bathrooms are counted as living space if their access is through living space. For instance, a bathroom in a loft is considered living space if the loft is a sleeping area. If the bathroom is accessed directly from the workspace, the bathroom shall be counted as workspace. If accessed directly from both, half the bathroom is considered living space and the other half commercial.
3. Interior hallways and closets shall be counted as part of the space to which they are adjacent.
4. Living and working spaces shall be within the same Work/Live Unit and be directly connected.

5. To accommodate flexible work activities, working areas shall be open and with as few interior walls as possible. “Offices” enclosed by four walls are considered living space because they are indistinguishable from bedrooms and cannot be used flexibly for different working activities.
6. All ground-floor units adjacent to the front façade shall have a street entrance directly into the working area. For these units, the working area shall be adjacent to the street right-of-way.