

September 19, 2025

Urban County Planning Commission
Division of Planning – Planning Services Section
101 E Vine Street, Level 7
Lexington, KY 40507

Re: Supplemental Justification Letter
PLN-MAR-25-00014: The Hub on East Maxwell
251, 253, 255, 261, 263, 271, and 273 East Maxwell Street; and 256, 258, 262, 266, 268,
270, and 272 Kalmia Avenue, Lexington, Kentucky

Dear Members of the Planning Commission:

We submit this supplemental justification letter for CS Acquisition Vehicle, LLC (“Applicant”) related to the redevelopment of the properties set forth above. A revised preliminary development plan and revised conceptual plans and elevations for this project will be submitted to you. This supplemental justification is to provide you with additional information related to this project.

The supplemental materials are based on the feedback from you, planning staff, and the neighbors. Applicant held a second neighborhood meeting on September 17, 2025, to present and discuss the initial revisions with neighbors, and some of the feedback from that second meeting was adopted in the supplemental materials such as the step back along Rose Street discussed below.

Currently, this block consists of older buildings with large parking areas to accommodate vehicles for the primary residents—students. While the existing rear yards may have once served as social spaces, they now serve as parking lots. The remaining green space is non-activated front and side yards that serve as traditional lawns with little to no features designed to promote social interaction or create a rich streetscape. The existing buildings do not reinforce key components of transit focused urban design called for in the Comprehensive Plan.

The intent of the Downtown Frame Business (B-2A) Zone “is to accommodate existing and proposed development in the transitional ‘frame,’ which surrounds the downtown core area, by providing for comparable and compatible uses while anticipating the future expansion of the downtown core area” (emphasis added). The project is within 700’ from the edge of the downtown core (Downtown Business (B-2) Zone), and it is adjacent to two other recently

rezoned B-2A Zoned properties: (1) The Maxwell; and (2) Subtext. This is a perfect location for another high-density residential development.

Up until the late 1980s, Lexington was constructing high-density residential buildings within the downtown area. Several of those residential buildings are located within the vicinity of this project and are taller than the proposed building. In 1960, the 13-story Christ Church Apartments was constructed at 137 Rose Street—three blocks from the proposed project—providing affordable housing for seniors. In 1985, the 9-story The Woodlands Condominiums was constructed in the Aylesford Neighborhood at 111 Woodland Avenue. In 1987, the 13-story City Centre Condominiums was constructed adjacent to the South Hill Neighborhood at 355 S. Broadway. Unfortunately, since the 1990s, Lexington has primarily built low to medium density residential housing throughout the city that has exacerbated the community's reliance on single-passenger vehicles and the housing gap.

The Kentucky Housing Corporation reports that Lexington has a rental housing gap of 14,423 units. To uphold the goals of the Comprehensive Plan, a substantial amount of the community's necessary rental housing must be built in the downtown area (and not on the outskirts of suburbia that lack multi-modal infrastructure). The three projects will bring residential housing to the downtown area, create a more transit focused urban design, and provide a net gain of hundreds of rentals units for the community to close that gap.

This project will create a rich and accessible street level experience, continue urban growth, and connect this area to the campus of University of Kentucky, the central business district, and the entertainment, leisure, and commercial areas to the east and west. This development will create a more walkable, active, and economically productive urban area in the immediate vicinity and beyond. Applicant has proposed numerous elements to activate the streetscape, encourage pedestrian activities, respect current elements in the area, and create the future context of the area (Theme A, Objective #2.b.; Theme D, Objective #2.a):

1. Applicant has revised the design of the building so that floors 7 and 8 have a step back along Rose Street, and there are building light wells along each street, to soften the building (Design Policy #4).
2. Applicant relocated the main entry and roof-top amenities from the intersection at East Maxwell Street and Rose Street to reduce some of the activities near the Aylesford Neighborhood (Design Policy #4).
3. Applicant has enlarged the plaza entry and exterior amenity spaces along East Maxwell Street to increase pedestrian activation and eliminate long stretches of solid surfaces at the street level (A-DS3-1: SP.2; Design Policy #5).
4. Applicant has increased the townhouses to 18 units, with each having a ground level access through its residential stoop to the ground level, eliminating long stretches

of solid surfaces at the street level and increasing pedestrian scale. The townhouses will also have internal entrance to access the amenities in the main building. (A-DS3-1: SP.2; Design Policy #5)

5. Applicant has increased the proposed width of the sidewalk along Rose Street from 5' to 8' to commence a more robust pedestrian connection between downtown and campus and will tie-in with the 8' sidewalk proposed along East Maxwell Street. Most of the existing sidewalks in the area are 3' to 5', and these enhancements will create a more walk-friendly corridor. (Design Policy #5).
6. Applicant has revised the plan to include traffic calming bulbouts and a dedicated drop-off / loading area in front of the main entrance for ride-share and food deliveries. To further reduce traffic congestion, there is a dedicated loading area within the building (on Stone Avenue) for Amazon, FedEx, and other delivery trucks to pull into the building to make deliveries. The building includes interior-package lockers for such deliveries for resident pick-up. Applicant is proposing to continue on-street public parking along eastern portion of the project on East Maxwell Street. (A-DS3-1: SP.12)
7. Applicant has increased the long term bike parking in the building. This will substantially exceed the bike parking minimum. This bike parking area is located within a secure room. There will also be external short term bike parking along East Maxwell Street for the main entrance. These elements are key components in the discussions for the city's Complete Street policies for our urban areas.
8. This project will reduce the number of curb cuts along the streets for driveways—fully eliminating them along East Maxwell Street and Rose Street. These elements are key components in the discussions for the city's Complete Street policies for our urban areas.
9. To increase the pedestrian experience, the townhouses are 2-story, with a Juliet balcony, fenced patio, and native-planted landscaping to separate its private space from the public space along the sidewalk (Design Policy #5). The proposed townhouses are similarly designed, but more activated, than the existing townhouses located along Euclid Avenue, Central Avenue, Old Park Avenue, Kentucky Avenue, and Clay Avenue within the Aylesford Neighborhood (Design Policy #4).
10. To further respect the architectural features of the existing apartments and surrounding area, Applicant is proposing adaptive reuse of building elements, such as limestone sills and bases, and materials from some of the existing structures. Applicant proposes to remove, clean, and reuse bricks and stonework from some of the existing buildings for the townhouses. (Design Policy #4)

11. Applicant will plant new trees and install garden-style landscaping areas along Kalmia Avenue, Stone Avenue, East Maxwell Street and Rose Street to further enhance the streetscape and soften the proposed building (Design Policy #5).

This project will create a rich and accessible street-level experience that adopts elements of the existing urban form and will continue the future context of the area.

The Comprehensive Plan provides that during the development process there should be no net-loss of tree canopy, but it also provides that no net-loss may be completed through a combination of tree preservation and tree mitigation. Applicant intends to preserve the street trees and plant new trees along the streets (Protection Policy #7; B-PR7-1). Applicant would need to dramatically reduce the building to preserve the interior and perimeter trees (non-street trees), which would cause an inefficient land use and reduce the number of dwelling units. With a combination of tree preservation and new tree plantings, the project will have substantially the same tree canopy calculation. And, at maturity those new trees should exceed the existing amount of tree canopy on this site, and there should not be a net-loss of tree canopy (Protection Policy #7; B-PR7-1; B-RE1-1). In this instance, the Comprehensive Plan's goals for providing new housing and densifying the downtown areas, along with the proposed tree mitigation, should outweigh the goal of tree preservation.

As stated in the Comprehensive Plan, pedestrians “focus on what is in front of them ... a building's height is less important than creating a rich and accessible street-level experience” (emphasis added; at Page 190). Applicant has proposed that the first and second floors of the building have many of the design characteristics that are found in traditional urban building design and which would result in a compatible relationship with its surroundings. As discussed above, this project will enhance the streetscape by reducing suburban-style elements, such as reducing setbacks, removing the twelve existing driveways, widening the sidewalks, and incorporating townhouses and other street level elements, to create a transit-oriented development (A-DS3-1: SP.2). As discussed above, Applicant is proposing adaptive reuse of architectural elements, such as limestone sills and bases, and materials from some of the existing structures to keep within the character of the area. The proposed townhouses are similarly designed, but more activated, than the existing townhouses in the area (A-DS3-1: AD.2). The first and second levels will have a clear break in materials and design from the multi-family portion of the building starting on the third level.

Starting on the third level of the building, Applicant is using several methods to break up massing of the multi-family portion of the building (A-DS3-1: AD.3). Starting on the third floor, the building is organized into multiple vertically-oriented section separated by large light wells that visually counter the building's mass and make it look like several smaller buildings. Applicant is proposing varying materials and windows to reinforce the visual break-up from one large building to several smaller buildings. Applicant is proposing that floors 7 and 8 of the building

will have a step back along Rose Street. These design features will create a more visually appealing building and avoid the monotony of large flat surfaces.

Even though the height and size of the building is in scale with several existing and planned buildings in the vicinity, Applicant is proposing that floors 7 and 8 of the building will have a step back along Rose Street. There are two high-density developments proposed to the immediate east of the project: (1) The Maxwell with a 75' tall building; and (2) Subtext with an 85' tall building (A-DS3-1: AD.2). While those two buildings had step backs at certain locations, step backs were recommended due to those buildings directly abutted small structures—there was only a distance of ~10' at one location. There are no adjoining structures to the proposed building (all other structures are locating on the other side of the streets), and with the road system acting as a physical barrier and a building setbacks, there is a distance of 70' to 75' between the building to those other structures. Further, the owners of those structures support this project and the proposed height, and none of them have requested that Applicant step back its building. As discussed above, there are a number of taller residential buildings in the area. This project will continue the evolution of the community into a more transit-oriented destination with higher density to house the community's growing population.

In summary, this well-designed project upholds the Urban Service Area preservation strategy, and it complies with the Comprehensive Plan. The proposed project meets the Goals and Objectives, Policies, and Development Criteria of the Comprehensive Plan for which planning.

I appreciate your consideration of these matters.

Sincerely,



P. Branden Gross