



November 23, 2022

Mr. Larry Forester, Chairman  
Lexington-Fayette Urban Co Planning Commission 200 E.  
Main Street  
Lexington, KY 40507 Dear

Chairman Forester:

AU Associates, Inc., a Kentucky corporation, (hereinafter referred to as "Applicant"), has filed a Zone Change Application and an associated Amended Preliminary Development Plan for a portion of the property located at 410 Sporting Court in Lexington, Kentucky. The site is a single lot of 2.5 (gross area), 2.0 acres (net area), currently zoned Professional Office (P-1). The property is bounded by New Circle Road rights-of-way on the north, a LFUCG park to the west and the parent tract to the east. The Applicant is seeking a zone change from the current P-1 designation to R-3 as more particularly explained below.

**A. Goals and Objectives:**

We believe that the Applicant's proposed development (the construction of a mixed-use affordable housing and office development) is in agreement with the 2018 Comprehensive Plan, specifically the Goals and Objectives that encourage the expansion of housing choices (Theme A, Goal #1); support infill and redevelopment (Theme A, Goal #2); support a model of development that focuses on people-first (Theme D, Goal #2); work toward an urban and rural balance (Theme E, Goal #1); and more specifically, accommodate the demand for housing in Lexington responsibly, prioritizing higher-density residential and a mixture of housing types (Theme A, Goal #1, Objectives b, c & d, Theme A, Goal #2, Objectives a, b & c and Theme A, Goal #3, Objectives a, b & d).

**B. Engagement:**

Although pre-application engagement is not required by the Zoning Ordinance or Comprehensive Plan, the applicant has pledged to engage property owners in the Wellington Place subdivision, to the far south of the property, and with the Open Gates neighborhood association. Open Gates is partially within the 500' notification radius but is on the opposite side of New Circle Road with no direct access to the site. It is located over 1.9 miles away from the site by driving or walking distance.

Two distinct neighborhood meetings will be conducted at LexCity Church in the evenings to accommodate neighborhood feedback on the design choices and Placebuilder type



as well to conduct feedback on the type of amenities that the senior facility should offer. Those findings will be presented prior to January 1, 2023.

**C. Site Description:**

The subject site is located south of New Circle Road, east of the LFUCG park, and north of Wellington Way. The parcel currently has dedicated access easement from Wellington Way to the subject property. The immediate surrounding zones are a mix of I-1 (light industrial), P-1 (Professional Office) and a remanent A- U (Agricultural Urban) which is the park. The contextual surroundings include R-1B (Single Family Residential), R-3 (Planned Neighborhood Residential), and 2 schools within a 1/2 mile radius of the subject property.

**D. Place-Type, Development Type & Requested Zone:**

The Preliminary Development Plan includes one building which houses 30 deed-restricted, affordable apartments for seniors. These one and two-bedroom apartments will be built with full ADA amenities and universal design principles and will be financed under the low-income housing tax credit.

Placebuilder defines seven place-types within the Urban Service Area boundary. Based upon the surrounding land-use type and zoning, this location is best suited for the Regional Center place-type, which is defined as:

*A vibrant hub of commerce, employment, housing opportunities, and entertainment. These are places that include larger buildings with human-scale active ground levels, intentional open spaces and plazas and walkable transportation networks, all to provider the user/resident with a unique experience. A mix of uses is required to cultivate a sustainable center that is adaptable to future conditions, and they should increasingly include higher-density residential options. They are most often located at eh intersection of major roadways and along primary corridors. (Page 291)*

Further, the Regional Center place-type identifies medium and medium/high density residential as a few of the most suitable development types in this place-type. This 30-unit project meets those classifications.

The most appropriate place-type for the site is Regional Center because of the context of the surrounding area. Although the smaller two-acre site itself does not carry all the traits of the Regional Center place-type, the surrounding multi-modal, commercial, residential and office uses combine to epitomize the definition of the Regional Center, which is anchored by the Fayette Mall, Lexington Green, Shillito Park and the Ruccio Way Meijer. Bounded by New



Circle Road, Nicholasville Road and the Reynolds Road corridor, the infill of the old RJR Tobacco Site with a variety of uses has always been the intention of the overall neighborhood development plan. The lack of multifamily housing, and affordable housing at that, in the area is partially addressed by the addition of this project. The Applicant believes that the immediate area is well-served with single family housing, employment opportunities and educational facilities. However, the Applicant contends it can increase the availability of the housing type options that are needed within this neighborhood to complement the other Regional Center amenities.

While Placebuilder does not specifically recommend zoning classifications R-3 or R-4 in the Regional Center zone, we do believe that R-3 is completely compatible with the Medium Density Residential development type that is recommended in this place-type. If the applicant were creating a Regional Center from scratch, they might explore the MU zoning types; however, in this case, the project aims to use infill land WITHIN an existing Regional Center place-type to create a complementary multifamily use that is missing in the existing Regional Center. In order to do this on a smaller parcel and to focus on multifamily senior housing only, the R-3 zone is the most appropriate given the 30-unit development.

**E. Development Criteria:**

To supplement the Placebuilder development criteria, the design team has prepared an annotated graphic of the proposed Development Plan. However, additional development criteria deserve further explanation, and the information on the following page shows a few of the important variables that make this Development Plan and the Multifamily Design Standards compatible and illustrate that the requested zone change agrees with the Comprehensive Plan.

The following design standards of Medium Density Residential are being met, and are annotated on the Development Plan and the attached architectural renderings:

<i>Site Design, Building Form &amp; Location</i>		<i>Transportation &amp; Pedestrian Connectivity</i>	<i>Greenspace &amp; Environmental Health</i>
A-DS3-1	A-DN2-1	A-DS4-1	A-DS4-3
A-DS3-2	A-DN3-2	D-CO2-2	B-PR7-1
A-DS5-3	D-SP9-1		E-GR3-1
A-DS7-1	E-GR9-4		



The following information supports our assertion that the proposed zone change agrees with Imagine Lexington: The 2018 Comprehensive Plan, Multi-Family Design Standards.

<i>Site Design, Building: Form &amp; Location</i>	
A-DS3-1	<p>Multi-family residential developments should comply with the Multi-family Design Standards in Appendix 1.</p> <p>The applicant intends to meet the multi-family design standards as the standards apply to the development of the proposed R-3 zone change. The preliminary development plan annotates the proposed site improvements related to the Multi-Family Standards. The following outlines the proposed site and building elements included in this mixed-use development project:</p> <p><u>Site Planning:</u></p> <ul style="list-style-type: none"> <li>• All internal community amenities are centrally located and linked to both indoor and outdoor communal space and the elevator. (SP.6)</li> <li>• Every apartment will be compliant with the ADA and contain universal design principles. (SP.16)</li> </ul> <p><u>Open Space &amp; Landscaping:</u></p> <ul style="list-style-type: none"> <li>• The proposed site plan will include physical and visual connections to open spaces on the property, both public and private. (OS.1)</li> </ul> <p><u>Architectural Design:</u></p> <ul style="list-style-type: none"> <li>• Per the architectural rendering and the building façade type, shape and height, we are compliant with the following architectural design guidelines for multifamily development: AD.2, AD4, AD.5, AD.7, AD.8.</li> </ul>

**Conclusion:**

We ask, on behalf of the Applicant, that the Planning Staff and Planning Commission favorably consider the proposed zone change and its relationship to fulfilling the mission, goals, objectives, and policies of Imagine Lexington: The 2018 Comprehensive Plan. Thank you in advance for your consideration of our proposed zone change and we look forward to presenting our case in full at a public hearing. We will be pleased to answer any questions about our proposal between now and the public hearing.

Sincerely,

Johan Graham  
President, AU Associates, Inc.