

September 6, 2022

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

**RE: Request for Zone Change, Conditional Use & Variance at
530 East High Street**
Applicant: Winterwood, Inc.

Dear Chairman Forester:

McBrayer PLLC and Earthcycle Design, LLC represent Winterwood Inc., Lexington, Kentucky, which has filed a Zone Change Application and an associated Amended Preliminary Development Plan for the property located at 530 East High Street in Lexington, Kentucky. The site is a single lot of 1.346 acres (gross area), 1.089 acres (net area), currently zoned Two-Family Residential (R-2), and utilized as a place of worship for Woodland Christian Church.

The property is bounded by rights-of-way on two sides: East High Street to plan north and Kentucky Avenue to plan west, with the remaining to two property lines bordering Two-Family Residential (R-2) lots. As more particularly explained below, Winterwood is requesting (i) a Zone Map Amendment from Two-Family Residential (R-2) to High Density Apartments (R-4); (ii) a conditional use permit allowing the continued use of the church as a place of religious assembly; and (iii) a variance to the required parking.

The property is within the Aylesford Local Historic District and in juxtaposition to Woodland Park along East High Street. The proposed project will maintain the century long traditional use of the Woodland Christian Church while offering a sustainable and practical future for the property, in keeping with the Church's core values and within the contextual surroundings of the historic neighborhood with an affordable senior housing addition.

I. Goals and Objectives:

Our team firmly believes the proposed development (the infill and redevelopment of mixed-use affordable housing with the church) is in conformance with the 2018 Comprehensive Plan, specifically, Goals and Objectives that:

- Encourage the expansion of housing choices (Theme A, Goal #1);

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- Support infill and redevelopment throughout the urban service area (Theme A, Goal #2);
- Provide for well-designed neighborhoods & communities (Theme A, Goal #3);
- Address community facilities at a neighborhood scale (Theme A, Goal #4);
- Reduce Lexington-Fayette Urban County's carbon footprint (Theme B, Goal #2);
- Apply environmentally sustainable practices to protect, conserve and restore landscapes and natural resources (Theme B, Goal #3);
- Support and showcase local assets to further the creation of a variety of jobs (Theme C, Goal #1);
- Encourage an entrepreneurial spirit and enhance a talented, creative workforce by establishing opportunities that embrace diversity with inclusion in our community (Theme C, Goal #2);
- Work to achieve an effective and comprehensive transportation system (Theme D, Goal #1);
- Promote, support, encourage & provide incentives for public art (Theme D, Goal #4); and
- Uphold the urban service area concept (Theme E, Goal #1);
 - 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 & d, Theme A, Goal #3, Objectives a, b & d and Theme A, Goal #4, Objective b).

II. Engagement:

Woodland Christian Church has been a bedrock of the Aylesford Neighborhood Community for over 100 years, physically, socially, and spiritually. As a part of Woodland Church's presence in the community, the Aylesford Place Neighborhood Association hold their regular monthly neighborhood meetings at the Church. This tradition of community engagement provided the setting for a meeting held on August 16, 2022, at 7:00 p.m., to discuss the future of the Church and property.

Members of the church leadership, representatives from Winterwood and design team members from Necto Architecture and Earthcycle Design outlined the proposal to keep the Church and its services and community support, while providing for a sustainable and viable future for the next century, with an addition of 38 affordable housing units for seniors. During the hour and half meeting a number of questions were raised by attendees ranging from the Church's future activities to the affordability of the housing units. At the end of the meeting, the current president of Aylesford Place Neighborhood Association expressed his thanks for the presentation and offered an endorsement of the project to the Church and team.

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In addition to the engagement with the neighborhood association, the design team met onsite with staff from LFUCG's Historic Preservation Office to discuss and review the proposed project scope on July 22, 2022. On August 17, 2022, Jay Copley with Necto Architecture attended LFUCG's Board of Architectural Review to present the schematic design in a preliminary review process. In addition to LFUCG's Historic Preservation Office engagement, Jay Copley met and reviewed the schematic design with Kentucky Heritage Council for feedback on August 25, 2022.

III. Site Description:

The subject site is in the historic Aylesford Place Neighborhood at the corner of East High Street and Kentucky Avenue across from historic Woodland Park. Woodland Christian Church has been located at this site since 1908, with the current sanctuary and classrooms completed in 1925. The church has provided services to the walkable neighborhood of Aylesford Place for more than 100 years. Over the past decades, the residential housing immediately surrounding the property has transformed from primarily single-family dwellings to a mix of one (R-1E) and two-family (R-2) owner occupied and rental residential units, with neighborhood business (B-1) and professional office (P-1) property included. Within a one-half mile walk of the property, the neighborhood is a mix of residential zones ranging from single family (R-1E) to high rise apartment (R-5), along with neighborhood business (B-1), professional office (P-1) and commercial center (B-6P), offering a rich, diverse, and accessible environment.

IV. Place-Type, Development Type & Requested Zone:

The 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 Enhanced Neighborhood place-type, which is defined as:

An existing residential area to be enhanced with additional amenities, housing types, and neighborhood serving retail, services, and employment options. Development should be context sensitive to surrounding areas and should add to the sense of place. Incorporating multimodal connections is crucial to neighborhood success and viability. (Page 266)

Further, the Enhanced Neighborhood place-type identifies low, medium, and medium/high density residential as well as and low density non-residential / mixed-use land use within the place-type. The 530 East High Street property fits the place-type criteria for Enhanced Neighborhood since the nature of the proposed affordable housing with a church contributes contextually to the Aylesford Place community fabric as: (i) the proposed development offers the needed diverse housing unit type in this area; (ii) the proposed housing increases density within the infill and redevelopment overlay district; (iii) the project will support the increased use of the existing multi-modal transportation

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network; and (iv) the proposed project will ensure the long-term sustainability of Woodland Christian Church as a cornerstone of the community with the adaptive reuse of the existing property at a high density.

In addition, the applicant selected medium density residential as the most suitable development type due to the fact the surrounding residential zones offer few options for diversity in housing types. We believe that the immediate area is well-served with single and two-family housing, employment opportunities, neighborhood businesses and educational facilities. This project will increase the availability of the housing type options that are needed within the neighborhood with infill/adaptive reuse. The proposed project will meet the community's needs for affordable housing and support the Comprehensive Plan's goals associated with infill and redevelopment.

Furthermore, Placebuilder recommends the following potential zoning categories associated with the proposed Enhanced Neighborhood place-type: R-3, R-4, MU-1, MU-2 and B-1 zones. The proposed adaptive reuse and redevelopment of 530 East High Street property aligns with Placebuilder's recommended zones for enhanced neighborhood, that of medium density residential. Based upon the number of planned housing units, 38 affordable senior living apartments, our team is requesting a zone change to High-Density Apartments (R-4) zone.

The Preliminary Development Plan includes retaining the footprint of the existing 1925 church building with an addition of a three-story multiple-family housing unit. The proposed multiple family housing component will consist of 38 one-bedroom affordable units for seniors (over 55 years old). In addition to the renovation of the interior of the church, including classroom spaces and the above-mentioned addition, the redevelopment of the property will include redesigned parking lots with permeable pavement for stormwater management, outdoor plaza areas, sidewalk connections to East High and Kentucky Avenue, and outdoor space for public art display. The housing addition will be set back from East High Street to maintain an ample front yard. To further downplay the addition to the historic church, the addition will be set down into the landscape to take advantage of the gradual slope, reducing the overall height of the three-story structure while aligning with the existing building's floors and exterior architectural banding.

Based upon the 38 residential units proposed for the 1.089 net acre site, this represents a density of 34.89 dwelling units per acre. In addition to the residential units, the proposed redevelopment will continue the Woodland Christian Church, retaining their services and outreach to the surrounding community. The applicant understands the vision of the community, as outlined in Imagine Lexington: The 2018 Comprehensive Plan. The mission statement, goals and objectives, and the Placebuilder criteria are well-served by the proposed property infill and redevelopment. The applicant believes that the request is in accord with the Comprehensive Plan, based upon the context of the site location, and that the site most closely aligns with the Enhanced Neighborhood place-

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type and medium density residential development type. We consider the proposed High-Density Apartments (R-4) zoning to be appropriate for this project.

V. Development Criteria:

To further address 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 pages shows that the requested zone change agrees with the Comprehensive Plan. The following enhanced neighborhood medium density residential design standards are being met, and are annotated on the Development Criteria Plan and the attached architectural renderings:

<i>Site Design, Building Form & Location</i>	<i>Transportation & Pedestrian Connectivity</i>	<i>Greenspace & Environmental Health</i>
A-DS3-1	A-DS1-2	A-DS4-3
A-DS5-3	A-DS4-1	A-EQ7-3
A-DS5-4	A-DS5-2	B-PR7-2
A-DS7-1	D-CO2-2	B-PR7-3
A-DS7-2	D-SP1-3	B-RE1-1
A-DS10-1		B-RE2-1
A-DN2-1		E-GR3-1
B-SU11-1		E-GR3-2
C-L16-2		
C-L17-1		
C-PS10-2		
D-PL10-1		
D-SP9-1		
E-GR5-1		
E-GR9-4		

The following information supports our assertion that the proposed zone change is in concurrence with Imagine Lexington: The 2018 Comprehensive Plan.

<i>Site Design, Building Form & Location</i>	
A-DS3-1	<p><i>Multi-family residential developments should comply with the Multi-family Design Standards in Appendix 1.</i></p> <p>The applicant intends to meet the multi-family design standards as the standards apply to the redevelopment of the proposed High-Density Apartments (R-4) zone change.</p>

	<p>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>Site Planning:</p> <ul style="list-style-type: none">• The proposed redevelopment retains the historic church as the primary focal point for the site with the addition complementing and reinforcing the church's street presence. (SP.1)• The proposed plan envisions multiple secure ground level access points to the addition while maintaining the historic entrances to the church as a part of the proposed project. (SP.2)• The proposed addition's entrance will provide an accessible, secure, and visible means of egress to East High Street to enhance the sense of arrival to the property. The addition will also have an accessible egress to the parking lot at the rear of the property. (SP.3)• The proposed addition setback is in keeping with location of dwelling as indicated on the 1934 Sanborn Map. The addition setback location is also in response to the historical nature of the Church. (SP.4)• Sidewalks are proposed to connect the addition from East High Street and Kentucky Avenue. (SP.5)• As a part of this proposed infill/redevelopment project, the East High Street entrance will service as a focal point with gathering area and the opportunity for public art display. (SP.6)• Proposed site redevelopment includes placement of the parking lot to the interior of the site with additional landscape islands to soften the impact of the parking lot. Landscape islands and open areas will reduce the physical and visual impacts of the parking lots. (SP.7, SP.8)• The addition will have direct views towards Woodland Park, directly across East High Street.
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	<p>The front façade of the addition will have both visual and physical access to the park. (SP.9)</p> <ul style="list-style-type: none"> • The proposed Preliminary Development Plan annotates multimodal connections to the surrounding rights-of-way. (SP.10) • While this development does not propose additional public rights-of-way, the proposed development encourages use of existing sidewalk system to access common areas within the property. (SP.11) • The proposed redevelopment of the property will provide additional and improved pedestrian connections to the public rights-of-way • The proposed parking lot will include site lighting with energy efficient LED directional lighting. (SP.15) • The proposed development will employ universal design principles to the maximum extent practicable. (SP.16) <p>Open Space & Landscaping:</p> <ul style="list-style-type: none"> • As noted in the site planning section, the proposed site plan will include physical and visual connections to open spaces on the property and adjacent public open spaces. (OS.1) • The proposed project will include a common open space for the residents as well as open space surrounding the perimeter of the site. (OS.2, OS.3) • A new landscape planting will be implemented as a part of this proposed project to differentiate and define public, private, and intimate outdoor spaces. (OS.4) • Canopy and flowering trees will be installed in newly created landscape islands. (OS.5) • Enhanced perimeter landscape screening will be a part of the proposed development. (OS.6, OS.7) • The proposed stormwater management for the project will include green infrastructure practices as
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	<p>well as connections to open space areas. (OS.8)</p> <ul style="list-style-type: none"> • Universal design principles will be the goal for all accessible routes. (OS.9) • Proposed landscape will help to create a sense of arrival to the property and define the entry points to each building. (OS.11) • New site lighting will be a part of the development project. (OS.12, OS.13) <p>Architecture Design:</p> <ul style="list-style-type: none"> • The height, size, and character of the proposed new and existing buildings on our site refer to the adjacent historic commercial buildings that are diagonally across the street from the existing historic church. The existing buildings are two- and three-story structures with low-slope roofs (similar to the existing historic church). So that the proposed new addition is subordinate to the existing church, it is set further back from the road and lower than the church building. However, materials and low-slope roof will relate architecturally to the historic church and it's context. (AD.2) • The building mass and facades of the proposed new building are articulated by the building footprint that follows the property lines and the change in materials across each of the building's unique elevations around the building. (AD.3) • The window number and size relate to that of the existing church to create a sense of historic uniformity while also providing views to adjacent neighborhood greenspaces (Woodland Park is across the street). (AD.4) • The building addition plan avoids large areas of blank walls facing the street by locating the majority of the new building towards the back of the empty adjacent lot. (AD.5) • The areas where vertical and horizontal surfaces meet are detailed by creating different sections/functions within the new building footprint. The front of the building and sides of the building are addressed with materials similar to
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	<p>those of the existing historic church. The use of building setbacks and changes in the building materials and building form provide multiple moments that enhance the buildings' character. (AD.6)</p> <ul style="list-style-type: none"> • The use of different materials and colors on the facades of the new building are utilized to relate the new proposed building to the historic adjacent Woodland church. The use of similar materials creates uniformity with the historic building without mimicking the historic details. (AD.7) • Both the front and side facades are of similar detail as it relates to the front and sides of the existing historic church that it is adjacent to. (AD.8) • The site layout of the new building provides open spaces and pedestrian circulation between the new and existing historic church. The connector/bridge provides a transparent/glass bridge from the existing historic church to the new residential building. The additional building setbacks help accentuate this separation and also provide areas where landscaping can enhance connection between the buildings. The similar scale of the buildings also helps to create a courtyard area between the structures that is accentuated by similar building materials that follow the lines/elevations of the existing historic church. (AD.9)
A-DN2-2	<p>Our proposed redevelopment minimizes contrasts in scale by creating a stair step affect from the existing church elevation along East High Street to the 3-story addition.</p>
C-L16-1	<p>The proposed project offers increased density multi-family housing within a ½ mile walkable distance to many services and support activities along this major arterial/corridor as identified in the 2018 Comprehensive Plan.</p>
D-PL7-1	<p>As part of the public engagement, members of development and design teams met with the Aylesford Place Neighborhood Association at Woodland Church. The proposed project received positive feedback for those attending.</p>
D-PL9-1	<p>The Woodland Christian Church is being preserved and rehabilitated. We have support from the State Historic Preservation Office for historic tax credit financing for the</p>

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	rehabilitation of the existing church. The new residential building we are proposing next to it has a connector/bridge that only attaches to a small 3 story portion of the existing church. At this connection we are enlarging existing window openings to provide egress and ingress from the existing church to the new residential building. This connector will provide a much-needed, code compliant rated stair and elevator for the church and residents.
E-GR4-1	One of the main reasons for this proposed unique project will be to maintain the historic church not only as a structure but a functioning place of worship and service for the Aylesford Place community.
E-GR9-1	While the units will be for senior housing (55 and over), work/live would be a possibility provided all applicable regulatory requirements are met.
Transportation & Pedestrian Connectivity	
D-SP6-1	The proposed redevelopment and adaptive reuse of the church will continue to provide outreach services. These services will continue to be accessible via the existing mass transit, bike, and pedestrian modes of transportation.

Since this proposed project is a mixed-use development, a number of the Placebuilder development criteria are not applicable to the proposed zone change. Those are listed below, along with a brief explanation of why they are not pertinent to proposed redevelopment of the building and/or the site.

Site Design, Building Form & Location	
A-DS7-3	No parking structure is proposed for this project.
A-DS8-1	The proposed project will not include single-family detached housing.
A-DS11-1	The proposed project will not include public common uses since the redevelopment is adjacent to Woodland Park.
A-DN3-2	The proposed project does not include a commercial
A-DN6-1	The proposed project proposes only multi-family affordable housing
A-EQ7-1	The proposed project does not include a school site.
B-PR9-1	No environmentally sensitive areas have been identified for this site.
C-PS10-3	No over parking will be a part of this proposed redevelopment.

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D-PL10-1	No public streets will be created with this project.
D-SP3-2	No cellular tower antennae will be required with this project.
E-GR9-3	The proposed is for medium density multi-family affordable housing as a part of the zone change request.

Transportation & Pedestrian Connectivity	
A-DS1-1	No additional mass transit infrastructure is proposed for this project.
A-DS5-1	Multi-modal infrastructure is currently in place along East High Street.
A-DS10-2	The proposed redevelopment will not include a public focal point.
A-DS13-1	The proposed development project has no stub street adjoining the property.
B-SU4-1	The proposed redevelopment project is adjacent to Woodland Park.
D-CO1-1	The proposed redevelopment project currently has adequate ROW and multimodal facilities for the proposed zone change.
D-CO2-1	Improves to multimodal facilities and right-of-way on East High Street have been recently completed.
D-CO4-1	No dead-end streets or cul-de-sacs are proposed for this development project.
D-CO4-2	The proposed project is in a section of Lexington with an existing grid network of public right-of-way.
D-CO4-3	No additional public streets are anticipated for this infill/redevelopment project.
D-CO5-1	No additional public streets are anticipated for this infill/redevelopment project.

Greenspace and Environmental Health	
B-PR2-1	For this infill/redevelopment project, no environmentally sensitive areas have been identified.
B-PR2-2	For this infill/redevelopment project, no floodplain is located on the property.
B-PR2-3	For this infill/redevelopment project, no floodplain is located on the property.
D-SP2-1	For this infill/redevelopment project, no school site is provided.

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D-SP2-2	For this infill/redevelopment project, no school site is provided.
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VI. Proposed Conditional Use:

As a part of the zone change application for the above referenced property, the applicant, in conjunction with the property owner, proposes the continuation of the Woodland Christian Church for this unique infill/redevelopment project. Under Lexington-Fayette Urban County Zoning Ordinance Section 8-13(d) High Density Apartments (R-4) Zone, Conditional Uses: Places of religious assembly are permitted with a conditional use permit. The following supplements the justification for the requested zone change from the existing Two-Family Residential (R-2) zone to the High-Density Apartment (R-4) zone with a conditional use permit for a place of religious assembly. We have outlined the 2018 Comprehensive Plan goals and objectives that are relevant to the requested zone change for the subject property. This summary identifies 2018 Comprehensive Plan Themes, Pillars and Policies that support the conditional use permit, as follows:

VII. Themes, Pillars and Policies:

We believe that the proposed adaptive reuse and redevelopment of the existing church property into an affordable housing development with a place of religious assembly is in agreement with the 2018 Comprehensive Plan for the zone change and the issuance of a conditional use permit, specifically the Themes, Pillars and Policies that encourage the highest density of residential development along major corridors & downtown (Theme A, Pillar II, Policy #1), and which include: Redevelopment/infill with increased density through context sensitive design (Theme A, Pillar II, Policy #2); Creation of opportunities for additional neighborhood supportive uses (Theme A, Pillar II, Policy #3); Locating higher-density areas along higher capacity roadways (Theme A, Pillar II, Policy #4); meeting demand for housing across all income levels (Theme A, Pillar III, Policy #1); Providing affordable housing across all areas (Theme A, Pillar III, Policy #2); Adding residential opportunities by up-zoning near transit (Theme A, Pillar III, Policy #3); Integrating community facilities into neighborhoods (Theme A, Pillar III, Policy #7); Implementing universal design principals for housing (Theme A, Pillar III, Policy #8); Promoting roadway, pedestrian and bicycle connectivity (Theme B, Pillar II, Policy #2); Increasing density along major corridors to reduce vehicle miles traveled (VMT) (Theme B, Pillar II, Policy #3); Discouraging vehicle-oriented development to reduce parking footprint (Theme B, Pillar II, Policy #5); Increasing green infrastructure practices with redevelopment (Theme B, Pillar II, Policy #11); Increasing tree canopy (Theme B, Pillar III, Policy #1); Supporting community gardens (Theme B, Pillar III, Policy #3); improving air quality by reducing vehicle miles traveled (VMT) (Theme B, Pillar III, Policy #4); and incorporating elements to create complete neighborhoods (Theme D, Pillar II, Policy #2).

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The successful implementation of this proposed affordable housing for seniors with a place of religious assembly project meets many of the stated elements within the 2018 Comprehensive Plan. While many of the stated themes, pillars and policies center on increased density along major corridors, create connected neighborhoods and provide affordable and accessible housing, this overall project accomplishes just that, thus providing Woodland Christian Church the opportunity to continue its mission. An assessment by the church of their historic building physical and financial condition found significant decline in recent years. The infill/redevelopment of the property with one-bedroom housing unit addition, along with the interior renovation of the existing building, will restore the functionality of the church while adaptively reusing underutilized portions of the building and site. This adaptive reuse will provide the facility and opportunity for aging community members to maintain a connection to their neighborhood and community as they age in place.

There is an abundance of support for a conditional use permit to be granted for Woodland Christian Church under the 2018 Comprehensive Plan. One additional fact to support the granting of a conditional use permit for this project is that Woodland Christian Church has existed on this property since its doors opened in 1925 and has been a part of the Aylesford Place Neighborhood since 1908. The church has operated prior to the adoption of planning and zoning within Lexington and prior to the urban county merger in 1972.

VIII. Proposed Variance:

In addition to the zone change and conditional use permit, we are requesting a variance of Section 8-13(n) of the Zoning Ordinance, which requires minimum parking for senior living facilities and places of religious assembly. Specific parking requirements are as follows; senior living facilities 0.75 space per unit and religious assembly, 1 space per 5 seats. Based upon these figures, the proposed infill/redevelopment would require $38 \text{ units} / 0.75 = 29$ parking spaces and $420 \text{ seats} / 5 = 84$ parking spaces for a total of 113 spaces. Parking requirements within the infill/redevelopment overlay district can apply a reduction for transit and bike facilities of 10%, thus reducing the total number of required parking spaces to 102. The redesign of the existing lot on the property and adjoining lot owned by the Church totals 61 spaces, leaving a 41-space deficit.

We are requesting a reduction in the total number of required parking spaces for the following reasons:

- The Church has operated since 1925 without meeting current off-street parking requirements.
- There is an abundance of on-street parking within walking distance of property.
- Multimodal transportation routes are adjacent to the property.

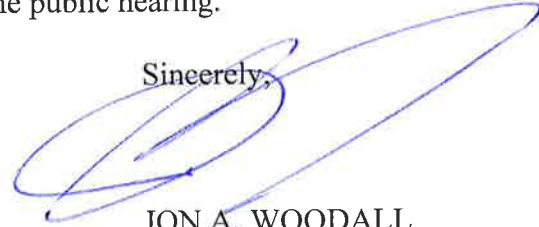
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- The stated goals, pillars, and policies of 2018 Comprehensive Plan for a more inclusive, dense, and walkable community.

IV. 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. The applicant will implement the proposed infill/redevelopment to enhance the quality of space in the Aylesford Place Neighborhood. Thank you for your consideration of our proposed zone change and we look forward to presenting our case in full at the public hearing on October 27, 2022. We will be pleased to answer any questions about our proposal between now and the public hearing.

Sincerely,



JON A. WOODALL

JAW/ss

4865-1747-9729, v. 1