

September 5, 2023

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

Re: Justification Letter for Zone Change
Meadow Oaks Farm LLC / 3320 Feliciana Lane / PIDN 38283240 (a portion of)
Ashford Oaks Residential Association, Inc. / 6810 Man O War Boulevard / PIDN
38283230 (a portion of)
From: Expansion Area Residential 2 (EAR-2) Zone
To: Community Center (CC) Zone
Proposed Place-Type: New Complete Neighborhood
Proposed Project Type: Medium Density Non-Residential / Mixed Use

Dear Members of the Planning Commission:

We submit this justification letter for Meadow Oaks Farm LLC's ("Applicant") application for a zone map amendment request for 3320 Feliciana Lane (a portion of) and 6810 Man O War Boulevard (a portion of) from Expansion Area Residential 2 (EAR-2) Zone to Community Center (CC) Zone, totaling 5.64 gross/net acres, in the development. The project complies with the 1996 Expansion Area Master Plan ("EAMP"), the 2023 Goals and Objectives, and the most recent Comprehensive Plan.

The site is currently vacant within the development, and it is used by the Applicant as pasture and for other agricultural purposes. This portion of the Expansion Area is characterized by residential land use of varying types to the south in the Blackford Oaks and Glen Eagles subdivisions. There are also several varying types of residential land on the other side of Man O War Boulevard. In 2017, a portion of the area on the development plan was rezoned from EAR-2 Zone to CC Zone. The WTVQ television studio and transmission towers are also located on the tract immediately to the north of the site.

The Applicant is proposing a development for a currently undeveloped area designed to provide a sustainable format with a mix of uses such as neighborhood-serving retail, services, and employment options, as well as larger town centers. The Applicant's proposal will promote and enhance tourism by providing accommodations for vacationers and traveling healthcare providers and patients utilizing the proposed healthcare campuses on Polo Club Boulevard. (Theme C, Goal 1.d.) The Applicant is proposing an opportunity to expand the mixed-use development to provide services and amenities to the development, including townhouses, dwelling units above retail and

office establishments, and the hotel. (Theme A, Goals 2.a., 3.a.) The Applicant is requesting that five acres of the property be developed within the CC Zone to allow its hotel development to move forward. The hotel spaces will include associated services and amenities, such as a spa, café, pool, bar, and restaurants, to be utilized by guests and surrounding residents. The hotel will be on the east side of the “great lawn” and existing pond, which serve as an internal focal point with connections for pedestrians and bicyclists. (Theme A, Goals 2.c., 3.d., 4.a.; Theme B, Goal 2.d.; Theme D, Goal 1.b.) The site is designed to activate and engage the development with the “great lawn” and existing pond as a prominent focal point accessible to all residents and visitors to add to the sense of place and community. (Theme D, Goal 2.a.) Other community serving businesses, like restaurants, barber and beauty shops, retail sales establishments and medical offices, are proposed on the existing CC Zone. The Applicant is proposing positive and safe social interactions for guests and surrounding residents to have access to various modes of transportation with ample street and sidewalk connections for pedestrians and bicyclists. The well-connected multi-modal transportation network is a key component of the development. (Theme A, Goals 3.b., 3.d., 3.e., 4.a; Theme B, Goal 2.d.; Theme D, Goal 1.b.) The development will continue to include the existing pond, pedestrian access ways, tennis courts, and other recreational and community facilities for the use of the residents. The development will continue to connect to the “park road” (Blackford Parkway) to serve as the area’s collector street. (Theme A, Goal 4.c.) While there are no current transit routes that extend to the site, Man O’ War Boulevard has existing transit service, and the project will contribute to demand that will make future transit expansion in this area more viable. The entertainment and other quality of life opportunities in the development will attract and retain workers to Lexington. (Theme C, Goal 2.d.) A total of 45 dwelling units are proposed within the boundary of the development plan on the remaining EAR-2 Zone for a density of 4.7 dwelling units per gross acre.

The EAMP, as Article 23 of the Zoning Ordinance, requires a finding that all new developments comply with the EAMP, but the EAMP states that “[d]evelopers should have flexibility to mix uses and housing types within the Expansion Areas.” As discussed below, the project complies with the recommendations of the EAMP (Subarea 2a). Subarea 2a of the EAMP recommended a density of 316-696 dwelling units for the entire Meadow Oaks Property (148 acres) split between the EAR-1 and EAR-2 zoning categories. The Applicant requested a zone change in 2001 in compliance with the Expansion Area Master Plan, with a proposal for a complete neighborhood with 676 dwelling units. With this zone change to the CC Zone, the Applicant is still proposing a density of dwelling units for the development that fits within the above referenced recommendation. The Applicant is not increasing the total density of the Meadow Oaks development with the modification now proposed, but rather adding CC Zone land uses to create a focal point and true community of place, as envisioned by the EAMP.

While this area is not one of the four locations originally designated for CC Zone future land use by the EAMP, but the EAMP recommended that Subarea 2a include both community centers and low density residential. The Applicant is proposing a CC Zone project that has the form and function of a traditional village or town center, with residential units. The project

complies with the Community Design Standards of the EAMP. The project has ample community spaces and private roads that are attractive and open to multiple modes of transportation. The Applicant has organized its commercial uses around those community spaces and private road. The EAMP also emphasizes that the key elements of a community of place are multi-purpose trips, reliance on alternative modes of transportation, calmed traffic, and a mix of uses organized around places of community, which the Applicant is proposing. The project is organized around a focal point that creates a place of community and a distinctive neighborhood. The new private road is being proposed as a boulevard. The commercial buildings are oriented to face the tree-lined private road, which will act as the central entry to the development. The hotel is a discrete node within the development. The development will have a well-connected multi-modal transportation network. The project balances the recommendations of the EAMP with the most recent desires of the community set forth in the Comprehensive Plan.

In conclusion, the project complies with the EAMP, the 2023 Goals and Objectives, and the most recent Comprehensive Plan.

DEVELOPMENT CRITERIA / THE PLACEBUILDER

The Applicant is proposing a development for a currently undeveloped area designed to provide a sustainable format with a mix of uses such as neighborhood-serving retail, services, and employment options, as well as larger town centers. Because the site is in the Expansion Area, none of the available zoning categories are recommended zones for the analysis under Placebuilder.

We submit that the project could be evaluated as the New Complete Neighborhood Place-Type and Medium Density Non-Residential / Mixed Use Development Type. The site and the project do not neatly fall within any of the Place-Types or Development Types. The site is located along a major arterial roadway, but Man O' War Boulevard is not identified as a "major corridor." Since the rezone is for a small area of the overall development but the neighborhood does not yet exist, an Enhanced Neighborhood Place-Type may be inappropriate. The New Complete Neighborhood could be an appropriate Place-Type, given that the site is located within an existing development plan for a complete neighborhood. With a hotel being proposed with four stories and the mix of commercial and residential uses, the project is in line with the characteristics of the Medium Density Non-Residential/ Mixed Use Development Type. Medium Density Non-Residential/ Mixed Use Development Type is a recommended Development Type in the New Complete Neighborhood. Given the location, context and scale of the project, the Medium Density Non-Residential/ Mixed Use Development Type and the New Complete Neighborhood Development Type may be the most appropriate. The project will have a well-connected multi-modal transportation network to an existing development. The hotel will provide neighborhood-serving restaurants and employment options for the complete neighborhood. The dwelling units on the top floors of the hotel will provide a new variety of housing options to the development.

The “great lawn” and existing pond will serve as a neighborhood focal point or place with connections for pedestrians and bicyclists to come from and to the complete neighborhood.

Attached hereto is a color-coded reflection of how we have addressed the design criteria listed in that Placebuilder category. Items highlighted in green are represented graphically on our included drawing, items in yellow are addressed in this letter, and items highlighted in orange we do not believe are applicable to the project.

Standards That Are Applicable

SITE DESIGN, BUILDING FORM, & LOCATION

- A-DS3-1 The Applicant will comply with Multi-family Design Standards, but the Applicant proposes to resolve demonstrate compliance with final development plan.
- A-DS4-2 The site’s proposed buildings are proposed at appropriate scale given the proposed uses, context, and scale of the proposed buildings on the adjacent projects.
- A-DS5-3 The proposed buildings are oriented to a new private road and mixed-use development across that new private road. The rear of the proposed buildings is oriented toward the “great lawn” and existing pond to integrate the hotel into those amenities. There will also be a central access to neighborhood in the rear of the development. This criteria is also represented graphically on our included drawing.
- A-DS5-4 The project has a pedestrian-oriented and activated ground level in the rear of the hotel to attract guests and surrounding residents. This criteria is also represented graphically on our included drawing.
- A-DS7-1 The proposed parking has been oriented to the sides of the hotel to the greatest extent possible to allow for the “great lawn” and existing pond to serve as an internal focal point or place with connections for pedestrians and bicyclists. The buildings are oriented to the central access for the development. This criteria is also represented graphically on our included drawing.
- A-DS7-2 The proposed parking will be screened from the new private road and Man O’ War Boulevard with new landscaping.
- A-DS10-1 The proposed residential units on the site are within walking distance of the proposed focal point. This criteria is also represented graphically on our included drawing.
- A-DN2-2 The site’s proposed buildings are proposed at appropriate scale given the proposed uses, context, and scale of the proposed buildings on the adjacent projects. The project includes multi-modal and other amenities to integrate the site with adjacent projects. The buildings range in height from one story to four stories. This criteria is also represented graphically on our included drawing.
- A-DN3-1 The residential units within the vicinity of the site will have multi-modal access to commercial opportunities on the site and adjacent mixed-use proposal.

- A-DN3-2 Residential units are proposed on the adjacent projects to have access to the internal focal point or place being proposed for the development, especially, the “great lawn” and existing pond. This criteria is also represented graphically on our included drawing.
- B-PR9-1 To the extent that the existing pond is a sensitive area, the Applicant will take appropriate actions to ensure its protection during the construction of the development.
- B-SU11-1 The development will incorporate impervious pavers and infrastructure.
- C-DI1-1 The CC Zone will allow the hotel and diverse retail businesses and services that will provide a wide range of employment opportunities, along with permitting residential units.
- C-LI6-1 Residential units will have access to the internal focal point or place being proposed for the development, especially, the “great lawn” and existing pond, and have access to the hotel and diverse retail businesses and services. This criteria is also represented graphically on our included drawing.
- C-LI7-1 The development will include single-family detached, townhouses and multi-family units, which have access to the internal focal point or place being proposed for the development, especially, the “great lawn” and existing pond, and have access to the hotel and diverse retail businesses and services. This criteria is also represented graphically on our included drawing.
- C-PS10-3 There will be shared parking between the various projects in the development to reduce the parking footprint. This criteria is also represented graphically on our included drawing.
- D-PL2-1 Currently, the closes businesses are a one-mile walk from the development.
- D-PL7-1 The Applicant has not consulted with stakeholders. The Applicant intends to identify the stakeholders and to consult with the same this month.
- D-SP3-1 The Applicant will install all necessary infrastructure.
- E-GR9-1 The development will include single-family detached, townhouses and multi-family units, which have access to the entertain and employment opportunities within the development. This criteria is also represented graphically on our included drawing.
- E-GR9-3 The multi-family units proposed for the site are low-intense styles. This criteria is also represented graphically on our included drawing.
- E-GR10-2 The hotel area will include associated services and amenities, such as a spa, café, pool, bar, and restaurants, to may be utilized by guests and surrounding residents.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

- A-DS4-1 The Applicant is proposing various modes of transportation with ample street and sidewalk connections for pedestrians and bicyclists, and the development will

- continue to connect to the “park road” (Blackford Parkway) to serve as the area’s collector street.
- A-DS5-1 The Applicant is proposing various modes of transportation with ample street and sidewalk connections for pedestrians and bicyclists and separation from vehicular traffic.
- A-DS5-2 The new private road has vertical edges.
- A-DS10-2 Multi-modal facilities will connect the internal focal point or place, especially, the “great lawn” and existing pond.
- B-SU4-1 The Applicant is proposing a large greenspace that has numerous connections to the immediate vicinity.
- C-PS10-1 There will be shared parking between the various projects in the development to reduce the parking footprint.
- D-CO1-1 The rights-of-way and multi-modal facilities are designed to connect to the development and adjacent projects and encourage pedestrians and bicyclists and to provide connections with the commercial spaces.
- D-CO2-1 The rights-of-way and multi-modal facilities are designed to provide safe facilities for all users on the site.
- D-CO2-2 The rights-of-way and multi-modal facilities are designed to provide safe facilities for all users on the site.
- D-CO4-2 The development will continue to connect to the “park road” (Blackford Parkway) to serve as the area’s collector street and provide multiple connection points to the development.
- D-CO4-3 The new private road in the development is being designed to utilize the existing farm driveway area to reduce the impact on existing trees and the topography.
- D-CO5-1 The new private roadway is being proposed as a treed boulevard with narrower lanes separated by a vegetative median.

GREENSPACE & ENVIRONMENTAL HEALTH

- A-DS4-3 The development is retaining the existing pond. This criteria is also represented graphically on our included drawing.
- A-EQ7-3 The proposed community open spaces are easily accessible, and the Applicant will delineate them from the private open space. This criteria is also represented graphically on our included drawing.
- B-PR2-1 To the extent that the existing pond is a sensitive area, the Applicant will take appropriate actions to ensure its protection during the construction of the development.
- B-PR7-1 Multi-modal facilities will connect the internal focal point or place, especially, the “great lawn” and existing pond.
- B-PR7-2 The Applicant is incorporating trees on the site.
- B-PR7-3 The Applicant is improving tree canopy on the site.

- B-RE1-1 The project is incorporating street trees which will create a more walkable area. This criteria is also represented graphically on our included drawing.
- B-RE2-1 The development will have multiple-modal facilities to connect to the greenspace network, along with impervious pavers and infrastructure.
- E-GR3-1 The development will have multiple-modal facilities to connect to the greenspace network.
- E-GR3-2 To the extent that the existing pond is a unique geographic feature, the Applicant is incorporating it into the development.

Standards Not Applicable

SITE DESIGN, BUILDING FORM, & LOCATION

- A-DS7-3 There are no proposed parking structures for the site.
- A-DS8-1 There are no proposed single-family detached units for the site.
- A-DS11-1 There are no proposed common public uses for the site.
- A-DN2-1 There are no proposed infill residential units for the site.
- A-EQ7-1 There are no proposed schools for the site.
- C-LI6-2 The Applicant is not proposing those housing types on the site.
- D-PL9-1 No structures are being removed from the site.
- D-PL10-1 The Applicant is not proposing any art easements , but the Applicant intends to have art and other focal points in the development.
- D-SP3-2 There are no proposed cellular tower antennae on the site.
- D-SP9-1 The Applicant is not proposing those housing types on the site.
- E-GR5-1 No structures are being removed from the site.
- E-GR10-3 The Applicant is not proposing any shared common space for the buildings.

TRANSPORTATION & PEDESTRIAN CONNECTIVITY

- A-DS1-1 The site does not abut a transit route.
- A-DS1-2 The site does not abut a transit route.
- A-DS13-1 There are no stub streets at the site.
- A-EQ3-2 The development is not a corridor.
- A-EQ7-2 No healthcare or social services facilities are proposed for the site.
- D-CO4-1 There are no dead-end streets or cul-de-sacs are proposed at the site.
- D-SP1-3 There are no proposed schools for the site.

GREENSPACE & ENVIRONMENTAL HEALTH

- B-PR2-2 No portion of the site is in a floodplain.
- B-PR2-3 No portion of the site is in a floodplain.

D-SP2-1 There are no school sites.
D-SP2-2 There are no school sites.

Sincerely,



J. Darby Turner, III