

**March 4, 2024**

Chairperson Larry Forester  
Members of the Lexington-Fayette Urban County Planning Commission  
200 East Main Street  
Lexington, Kentucky 40507

**Re: Zoning Justification Statement regarding proposed zone change for  
2350 Remington Way in Lexington, Application No.: PLN-MAR-24-00006  
From P-1, Professional Office to R-4, Medium-Density Residential**

Dear Members of the Planning Commission:

This letter is written on behalf of Denton Floyd Property Holdings, LLC (“Denton Floyd” or “Applicant”) which is filing a zone change application and preliminary development plan for property located at 2350 Remington Way (the “Property”) in Lexington. The Property consists of approximately 13.73 total acres and is currently zoned P-1 (professional office). Denton Floyd is requesting a zone change to the R-4 (medium-density residential) zone to allow for the construction of multi-family residential apartments on the property.

The proposed project and requested zone change meet the goals, objectives, policies, and specific development criteria outlined in the Imagine Lexington 2045 Comprehensive Plan (the “Comp Plan”). It will add much-needed market-price apartment housing to a quickly developing, growing area of Lexington. The proposed garden apartments will add a housing type not available in the immediate vicinity. Importantly, future residents of this proposed project will have both internal and external access to greenspaces, recreation, and community oriented opportunities. Finally, the planned housing would provide equitable access to nearby current and future job opportunities, retail goods and services, and public facilities. For the reasons provided in this letter, Denton Floyd respectfully requests that the Planning Commission consider and approve its requested zone change.

**I. History of the Property and description of the project.**

Denton Floyd seeks to rezone the Property from P-1 to R-4 to construct multi-family housing. This Property is currently surrounded by tracts in a number of different zones, including R-4 to the south, B-6P to the west, P-2 to the east, and I-1 to the north. This Property was originally part of the historic Beaumont Farm, and zoned for agricultural uses. That zoning designation has changed several times since the Property was part of a larger purchase from Kentucky River Properties, LLC in 2003.

While it was initially anticipated that the Property would be used for residential purposes and, according to Planning Staff at Denton Floyd’s pre-application meeting was zoned R-3 and

eventually R-4, it and adjoining parcels were rezoned in 2014 with a focus on industrial and commercial development. Since that rezoning, the goals and objectives of the City of Lexington and the Lexington Fayette County Urban Government Planning Commission have changed significantly—most notably, through the Placebuilder component of its comprehensive planning. The Property has now sat vacant under its current zoning for approximately a decade.

Now, Denton Floyd seeks to return the Property to its intended use when it was initially rezoned. The current site plan envisions 280 multifamily housing units that includes seven buildings, a clubhouse, a pool, and additional amenities for residents. Each multi-family building will contain at least four stories (the “Proposal”).

This Property is uniquely positioned for multi-family, medium-high density housing in Lexington. It sits just north of two major corridors, Citation Boulevard and Georgetown Road, and east of Remington Way. Importantly, it provides convenient interstate access because of its proximity to and Newtown Pike. The Property is also located between an industrial use to the north and condominiums zoned R-4 to the south. There are also a number of single-family neighborhoods and proposed future developments in this area. Because a medium-high density, multi-family apartment complex would provide a greater mix of housing types, particularly for current and future employees of local industries, the Proposal will provide more equitable and affordable access to housing. The proposed housing community would also provide a greater quality of life for those employees by providing proximity to current and future retail, access to goods and services, recreation, and multi-modal transportation.

## **II. The Project meets the goals and objectives of the 2045 Comprehensive Plan.**

The requested zone change is in line with applicable Goals and Objectives of the Comp Plan. Importantly, this project will provide necessary safe, quality-built, accessible, and market-affordable housing for families working and living in Lexington. Likewise, this site provides access to pedestrian walkways, bike paths, and public recreational areas. Additionally, based on current and future planned uses in the greater neighborhood, residents will have local and walkable access to retail, grocery stores, and entertainment. The specific goals and objectives, and Denton Floyd’s justification for each, is described in detail below.

### **Goal A.1 Expanding Housing Choices.**

The Proposal helps accommodate the demand for housing in Lexington because it provides higher-density housing to future residents. It also adds a different housing type to the immediate area, broadening options for future residents and creating neighborhood diversity for current residents.<sup>1</sup>

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<sup>1</sup> Objective A.1.b.

The project will provide safe housing for residents that will not only be affordable within current market rates, but will increase the housing stock in Lexington, thereby positively impacting the affordability of the housing market. Additionally, the project accommodates individuals with disabilities by providing, among other accessible features, elevators in each building. It will ensure that residents with disabilities can efficiently access any unit in the proposed community.<sup>2</sup> Higher-density housing is a focus of the Comp Plan, and this project will appropriately add 280 units to Lexington's market on a less-than-thirteen acre parcel within the urban service boundary.<sup>3</sup>

### **Goal A.2 Support Infill and Redevelopment Throughout the Urban Service Area as a Strategic Component of Growth.**

While not a redevelopment project, this proposal meets the goal of using space in the urban service area for mixed-used purposes, meeting the infill objectives of the Comp Plan. This development will plug medium-high density housing into the already established infrastructure systems supporting the property. With the future addition of retail, grocery, and business opportunities in the area, the need for higher-density housing close to these centers will become even more important.<sup>4</sup>

The Proposal will apply design standards that will certainly match the context of the surrounding area and complement existing design features.<sup>5</sup> Denton Floyd will provide the Planning Commission with conceptual drawings and renderings demonstrating the type of housing it builds and how the project will compatibly fit into the surrounding area.

Greenspace is incorporated throughout the development. Specifically, the Proposal's design centers around the intent to preserve and incorporate two legacy bur oak trees on the property. It also includes an outdoor dog park that is connected via the use of an eight-foot-wide trail to the other greenspaces through the development.<sup>6</sup> The Applicant also intends to construct a pool with an activated surrounding deck for an additional opportunity for residents to spend time outdoors. Offsite recreation is also conveniently available to residents with nearby access to Legacy Trail, a linear park that offers walking trails, etc.

### **Goal A.3 Provide Well-Designed Neighborhoods and Communities.**

This project provides opportunities for safe and positive social interactions among its future residents. The development includes a pool, a clubhouse, numerous connecting internal sidewalks, and access to the larger community. It also provides access to existing public transportation and bike lanes.<sup>7</sup> The proposed development will minimize the disruption of natural features, including,

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<sup>2</sup> Objective A.1.c.

<sup>3</sup> Objective A.1.d.

<sup>4</sup> Objective A.2.a.

<sup>5</sup> Objective A.2.b.

<sup>6</sup> Objective A.2.c.

<sup>7</sup> Objective A.3.b.

to the extent possible, the preservation of numerous trees and topographic features that currently exist. Importantly, Denton Floyd intends to preserve as much of the tree line between the parcel's neighbor to the south and the proposed development, and infill that area with additional landscaping as needed.<sup>8</sup>

Indoor and outdoor gathering spaces are a vital component of this development. The clubhouse will be a community center available to residents in the neighborhood and will be a focal point of the development. The pool will also provide an outdoor area for residents to gather and participate in recreational activities. Additionally, the development will include a dog park on the eastern edge of the property. Finally, a central greenspace—with a community focal point that is [Lexington's official tree](#)—will provide a second neighborhood-enhancing gathering space. This greenspace will include enhancements intended to activate the space, such as benches and other outdoor features. Each of these neighborhood-enhancing features will be connected by an eight-foot trail through the entire development that ultimately connects to Remington Way. It is also important to note that each of these features is intentionally spread through the development and provides residents in each portion of the neighborhood with ample access to gathering places and greenspaces.<sup>9</sup>

Importantly, this project envisions the expansion of Gatton Way, which is currently planned for the northern edge of the property, bordering the current neighboring industrial use. This provides additional access to Lexington's roadways, increases connections between new and existing development, and will ease traffic concerns through the neighborhood. Additionally, the current plan adds sidewalks to Lexington's walkable infrastructure and cleanly connects this community to the greater neighborhood area.<sup>10</sup> The Applicant also plans to explore the possibility of using the extension of Gatton Way to connect this development and others to the Legacy Trail.

#### **Goal A.4: Address Community Facilities at a Neighborhood Scale.**

As discussed in Objective A.3.d., the proposed project will incorporate community-centered recreational facilities and greenspaces—including a walking trail, dog park, two larger, activated green areas, a clubhouse, and a pool. All of these amenities will be connected to new and existing roadways by internal sidewalks. Further, the site plan proposes a specific short-term bike parking area near Gatton Way that will provide safe storage for residents who choose that mode of transportation.<sup>11</sup>

By developing Gatton Way and providing three access points to roadways, the project meets the goal of establishing roadway connections that reduce emergency response times and improves the efficiency of the operations of city services.<sup>12</sup> Notably, Lexington Fire Department

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<sup>8</sup> Objective A.3.c.

<sup>9</sup> Objective A.3.d.

<sup>10</sup> Objective A.3.e.

<sup>11</sup> Objective A.4.c.

<sup>12</sup> Objective A.4.c.

Station No. 24, located at 2754 Magnolia Springs Drive, is less than two miles from the proposed development.

**Goal A.5: Ensure Equitable Development and Rectify Lexington’s Segregation by Race and Socioeconomic Status Caused by Historic Planning Practices and Policies.**

By providing middle-income housing that is walkable and accessible by existing public transportation, the Proposal will create equitable transportation opportunities for all residents of Lexington. Importantly, this housing option will be integrated into a larger community that includes a wide array of housing types. This proposed project will help the City increase housing that rectifies planning practices that previously promoted racial and socioeconomic segregation. As the Comp Plan demonstrates, the proposed development sits just north of a portion of Lexington experiencing 41-60 percent poverty, and that is more diverse than most Lexington neighborhoods.<sup>13</sup> This project provides a middle-income housing option near those same areas.<sup>14</sup> As a result, establishing the Proposal on the Property will bring new residents quality housing options near goods and services that can be accessed by multi-modal transportation options, which allows residents to move around without relying solely on a private automobile.

**Goal B.3 Apply Environmentally Sustainable Practices to Protect, Conserve, and Restore Landscapes and Natural Resources.**

Denton Floyd intends to preserve as much of the existing landscape and the property’s natural resources as it can through this development.<sup>15</sup> For example, through the early identification of bur oaks on the property, and in meeting with LFUCG’s urban forester, Denton Floyd has made plans to preserve larger legacy trees on the property.<sup>16</sup> To the extent possible, it also plans to preserve other natural elements of the landscape as it currently exists.

Further, Denton Floyd plans to explore potential green infrastructure practices in constructing this project. It will consider potential grass filter strips, permeable pavement, or bioswales as part of the stormwater management plan for the development of the property.

**Goal C.2: Attract a Wide Array of Employment Opportunities.**

The greater area surrounding this proposed development contains opportunities for employment in a wide range of professions. In addition, with its proximity to Legacy Business Park, the University of Kentucky’s Coldstream Research Park and proposed developments that will no doubt create a significant increase in the available jobs in Lexington’s market, it will be critical for the City to ensure it has enough local housing to support its residents’ careers. Relatedly, the proposed housing not only provides access to the job market, but to lifestyle enhancing

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<sup>13</sup> See Comp Plan pp. 20-21.

<sup>14</sup> Objectives A.5.a. and Objective A.5.b.

<sup>15</sup> Objective B.3.b.

<sup>16</sup> Objective B.3.f.

opportunities for employees through local existing and future retail, restaurants, entertainment and recreation.<sup>17</sup>

**Goal D.1: Work to Achieve an Effective, Equitable, and Comprehensive Transportation System.**

This Proposal implements a pedestrian-first design by incorporating sidewalks and trails throughout the property. Additionally, it provides short-term bike storage and multiple, safe access points to roadways for residents who use biking for transportation. Those access points will help ensure that car traffic moves efficiently and safely through the property. Finally, public transportation is available within a short walking distance of the property. Specifically, LexTran's Route 2 has a stop at the corner of Citation Boulevard and Georgetown Road.<sup>18</sup> The development aims to provide a variety of options for transportation for its residents.

**Goal D.2: Support a Model of Development that Focuses on People-First to Meet the Health, Safety, and Quality of Life Needs of Lexington-Fayette County's Residents and Visitors.**

Denton Floyd seeks to ensure that the residents who live in this development have a positive quality of life. This development will use the Property's current landscape to allow residents to safely enjoy preserved elements of the natural environment. The site plan demonstrates some ways in which these areas will be activated.<sup>19</sup> For example, the site plan includes the construction of a pool and amenity deck, the incorporation of a dog park, a potential connection to the Legacy Trail, and activated sites around existing bur oak trees.

In planning the parking availability for the project, Denton Floyd lowered the number of parking spots to the extent possible, and increased walkable connections throughout the proposed development. While residents will still have plenty of access to parking, they will also easily and safely be able to walk to each of the residential buildings and amenities.<sup>20</sup> In addition to its proximity to other neighborhoods, retail, and services, the development creates middle-income housing with walkable access to one of Lexington's most-loved parks and recreational areas.

**Goal E.1: Uphold the Urban Service Area Concept.**

By building this project on undeveloped land within Lexington's current Urban Service Boundary, this Proposal will only help further responsible growth in Lexington. This project keeps needed housing within the City's core, and helps continued efforts to redevelop an underutilized corridor. While the Citation Boulevard and Georgetown Road area have significant commercial and industrial uses, and future retail, restaurant and entertainment uses, it does not have much existing or planned multi-family affordable housing. This helps add to the goal of ensuring

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<sup>17</sup> Objective C.2.f.

<sup>18</sup> Objectives D.1.a., D.1.b., D.1.c., and D.1.d.

<sup>19</sup> Objective D.2.a.

<sup>20</sup> Objective D.2.d.



Lexingtonians have housing options near where they work and want to live, while continuing to protect and provide access to rural land.<sup>21</sup>

**Appendix A: Multi-Family Design Standards**

Design Policy No. 3 recommends that multi-family residential developments comply with the Multi-Family Design Standards set forth in Appendix A. Each of those standards are addressed in the chart below.

<b>Site Planning</b>	
<b>SP.1</b>	The Proposal prevents residential lots from backing into public streets and areas by providing landscape screening and greenspace between Remington Road, Gatton Way, the neighboring condominiums, and the proposed apartment buildings.
<b>SP.2</b>	Each apartment building includes two separate entrances to the building.
<b>SP.3</b>	All Buildings will have entries that are prominent from the street, as demonstrated by the proposed conceptual design. Each entry will be easily distinguishable from the rest of the building.
<b>SP.4</b>	The setback for the development respects the existing setback patterns established by the surrounding developments. In the context of the Citation Pointe development to the south, and the industrial property to the north, the setback for this development links the two, distinct setbacks to cohesively integrate the proposed apartments.
<b>SP.5</b>	The pedestrian network within the development, including standard sidewalks and an eight-foot path, encourages access to Remington Way and the proposed extension of Gatton Way. Additionally, Denton Floyd would like to explore the possibility of connecting the apartments to Legacy Trail in Coldstream Park.
<b>SP.6</b>	The proposed amenities, such as a pool, a dog park, a clubhouse, walking trails, and additional services are all accessible from a nearly equal distance from two greenspaces featuring existing bur oak trees. Each amenity, and each greenspace, are connected by sidewalks and wider pedestrian walkways.
<b>SP.7</b>	Parking has been intentionally placed, to the extent possible, in the interior of the development and places the apartment buildings closer to the roadways. Where parking areas are near the public street, landscape screening is provided.
<b>SP.8</b>	All parking lots in the development are broken into smaller lots that enhance safety, accessibility and eliminate the appearance of large rows of cars.
<b>SP.9</b>	The dwelling units are intentionally placed to allow for as much viewing of the various open spaces in the development as possible.
<b>SP.10</b>	The development will connect directly to Huntly Place, which not only provides direct access to other residential neighborhoods, but also to Coventry Oak Elementary School. It provides an additional route of access to Georgetown Road so that Citation Boulevard is not the only point of access to main corridors. The extension of Gatton Way will greatly increase connectivity to surrounding industrial

<sup>21</sup> Objective E.1.a., E.1.b., E.1.c. and E.1.d.



	uses and Remington Way more generally, as well as, potentially, to the recreational areas in Legacy Park. Likewise, because there are three entrances to the development from surrounding streets, adequate emergency access has been provided with alternative access should one entry way be blocked, for whatever reason. Additionally, no points of access traverse through floodplain, which can cause complications accessing properties during significant rain events.
<b>SP.11</b>	There are three street connections in the proposed development that will increase connectivity and traffic calming. Further, the parking areas within the development are as connected as possible to avoid the creation of dead ends and cul-de-sacs.
<b>SP.12</b>	The development incorporates additional traffic calming measures, such as the inclusion of crosswalks, tight turn radii, and the prevention of long straightaways, where cars can achieve dangerous speeds. Further, appropriate street lighting will be added to help improve walkability.
<b>SP.13</b>	Interconnected sidewalks and paths within the development ultimately connect the neighborhood to streets, and other neighborhoods, in a safe way. Additionally, the development will continue the sidewalk that currently runs in front of the Citation Pointe development to Gatton Way, then add sidewalks to that road extension as well. Citation Boulevard currently has sidewalks and bike lanes that will help connect residents to Georgetown Road and other neighborhoods. While Georgetown Road does not currently include sidewalks or bike access, Citation Boulevard continues west and provides a number of connections to industrial complexes, such as Innovation Drive, and ultimately to larger neighborhoods such as Masterson Station with roadway connections to existing restaurants, retail and other services.
<b>SP.14</b>	In addition to the lighting and sidewalks previously discussed, the development incorporates tightly-spaced street trees near sidewalks and roadways to help create a pedestrian-friendly environment. This is shown throughout the site plan.
<b>SP.15</b>	Parking areas will be well lit to ensure pedestrian and driver safety, but will be tailored so as to not impact residents within nearby buildings.
<b>SP.16</b>	This development has been designed for accessibility. Each building will contain an elevator, making all units accessible for residents with disabilities. Additionally, the linked sidewalks and paths throughout the property will quickly and accessibly connect residents to the amenities and greenspaces throughout the development.
<b>SP.17</b>	The streets in the development are balanced on both sides in their use of pedestrian sidewalks, trees, incorporation of greenspaces, and the character of the buildings facing them.
<b>Open Space &amp; Landscaping</b>	
<b>OS.1</b>	The open greenspaces provided in this development will be easily accessible physically and visually to residents. Sidewalks and trails intentionally connect residents to those spaces, and two of them are marked by existing, large bur oak trees.
<b>OS.2</b>	The development has been designed so that, to the greatest extent possible, the buildings face open green spaces and other additions of landscape on the property.
<b>OS.3</b>	The renderings of the building design provide each unit with an appropriately sized private patio or balcony.



<b>OS.4</b>	The landscaping provided in the site plan clearly denotes the edge of the neighborhood and where the property meets public streets. Tree protection areas between the property and the condominium neighborhood to the south, and Coldstream Research Campus to the east, also designate the edge of the neighborhood. Finally, the development will implement smaller-scale landscaping throughout the neighborhood to appropriately line parking lots and internal streets. All landscaping will meet the requirements of Article 18, Landscape and Land Use Buggers (November 2022); Article 26, Tree Protection Standards of the Zoning Ordinance; and Article 6-10 of the Land Subdivision Regulations.
<b>OS.5</b>	The development will add trees, shrubs, and other landscaping features to soften the impact of parking areas in the neighborhood in line with the standards cited in response to OS.4.
<b>OS.6</b>	This property appropriately buffers parking and other facilities from adjacent properties, though they are not single family. It will do this by preserving the existing tree line between the proposed development and Citation Pointe to the south. A tree line will also buffer this multi-family residential development from Coldstream Research Campus.
<b>OS.7</b>	As the site plan demonstrates, instead of fences or walls, the property will buffer roads and neighboring properties through the use of existing and new tree lines.
<b>OS.8</b>	Stormwater management, sanitary sewers, storm sewers and public street improvements shall be designed and constructed in according with LFUCG’s engineering manuals. Further, storm water detention and management is provided in a regional basin to the north of the property on 2450 Georgetown Road.
<b>OS.9</b>	This development incorporates two types of paths that are accessible to all users, and connect to each amenity available in the neighborhood. In addition to regular sidewalks, eight-foot paths will be added to increase walkability and accessibility throughout the property.
<b>OS.10</b>	While the proposed development does not include many internal streets, it does clearly differentiate between the main entrance road that connects each of the buildings, and the parking areas throughout the property. As the site plan demonstrates, the primary entrance to the development creates a roadway not lined by parking, but only by pedestrian walkways.
<b>OS.11</b>	The project will use landscaping techniques that create a sense of entry, and will provide appropriate landscaping for internal streets, parking lots, and other connection points.
<b>OS.12</b>	Lighting will complement the building and landscape design, matching the architectural style, materials and colors found in the renderings attached to this application.
<b>OS.13</b>	All exterior lighting will meet applicable zoning regulations. Lighting will be directed toward the ground and shielded so it does not trespass into neighboring properties, residents’ units, or the night sky.
<b>Architectural Design</b>	

<b>AD.1</b>	The proposed development promotes variety by implementing design standards that complement but are different from the appearance of nearby developments. For example, as the renderings demonstrate, the proposed garden-style apartment buildings will differ in roof shape, building form, color and style from the Citation Pointe duplexes to the south, and from nearby single-family homes.
<b>AD.2</b>	Each proposed building at this site contains four floors of units. This height will complement and maintain the character of buildings in the area, such as Citation Pointe’s three-story buildings.
<b>AD.3</b>	As demonstrated by the preliminary renderings provided, the facades of each apartment building include varying roof shapes, wall setbacks, materials and colors to reduce the perceived building mass. The front elevation of the building provides added variety by implementing a different roof pitch and design from the back elevation. The clubhouse will carry many of the same features and will match the materials and colors used in the apartment buildings.
<b>AD.4</b>	The preliminary renderings show that the window space will be maximized both in number and size for each unit. Additionally, the units include balconies with double doors that will further enhance views and help spaces feel larger.
<b>AD.5</b>	There are no large areas of blank wall facing the street for any of the proposed buildings.
<b>AD.6</b>	The preliminary renderings for the apartment buildings show that more than four different types of material will be used to create variety and symmetry in the appearance of the buildings. The use of trim of various thicknesses and style, along with a simple black railing for each balcony, adds to the cohesive character of the design.
<b>AD.7</b>	The materials and colors used help distinguish between distinct architectural elements on the buildings. For example, as the preliminary renderings show, the front elevation’s middle section becomes the focal point of the building because of its unique roof pitch and the use of a separate point color from the other upper two floors of the building. Likewise, the clubhouse building contains a number of architectural elements—such as the use of different window patterns and roof pitches—to distinguish it from other buildings.
<b>AD.8</b>	All of the buildings in the proposed renderings maintain the same architectural design and level of detail on both the front and rear facades.
<b>AD.9</b>	As the preliminary renderings demonstrate, the buildings contain similar architectural shapes and lines so that the structures are cohesive. Additionally, landscaping will be implemented to intentionally provide smooth transitions between buildings and other elements of the property.

**III. Denton Floyd is in the process of engaging with the public.**

Denton Floyd understands the importance of engaging neighbors that may be impacted by this rezoning of the property. It has received the contact information for the condominium association for the neighborhood south of the Property, and is reaching out to request a time to set

up a time to discuss this project. Additionally, Denton Floyd has already reached out to the industrial user to the north of the property, and intends to contact the leadership of the Coldstream Legacy Business Park as well.

**IV. The proposed development meets the Comp Plan’s Placebuilder requirements for a New Complete Neighborhood place type.**

Of the Placebuilder’s seven place-types within the Urban Service Area boundary, this development is a New Complete Neighborhood. The applicable place type is defined as follows:

New Complete Neighborhoods are undeveloped areas designed to provide housing in a sustainable format. These areas should include neighborhood serving retail, services, & employment options, as well as town centers. Accessible greenspace, neighborhood focal points, & a multimodal transportation network should be provided to add a sense of place & connectivity.

(Comp Plan, p. 318). This place-type is appropriate for the reasons stated below.

**a. The project serves the New Complete Neighborhood place type site priorities.**

The New Complete Neighborhood place type encourages medium to medium-high density residential uses. Within the context of the surrounding area, the New Complete Neighborhood place type is most appropriate because it proposes additional, market-rate multi-family housing in an area that currently supports retail, services and employment. Additionally, with the anticipated development of sites in the immediate vicinity of this proposed project, dense, multi-family housing will certainly be in demand.

This proposal also encourages and promotes mixed housing types in the immediate area. The site neighbors Citation Pointe, a condominium association facing Citation Boulevard. Further, the proposed development’s primary entrance will face Huntly Place, cleanly connecting future residents to single-family neighborhoods in the Coventry subdivision. Further, to the south of the property, across Citation Boulevard on Remington Way, is another single-family home neighborhood. Incorporating multi-family market-price apartments in this area will increase diversity in available housing types.

Next, as the site plan demonstrates, this project will not only protect two legacy trees on the property, but uses them to create activated outdoor areas and greenspace for residents. The proposed project also adds to the existing tree canopy and ensures that these internal greenspaces are accessible to all residents in the development. Additionally, Denton Floyd has incorporated a dog park, pool, trails and other walkable amenities so residents can efficiently access outdoor recreation without leaving the property. If they do seek additional recreation and greenspace, this property directly neighbors and has walkable access to Lexington’s Legacy Park, which includes miles of multi-use paved paths.

In addition to providing easy access to Lexington's public parks, and longest trail system, the site is also near several other public facilities. For one, Coventry Oak Elementary School is just over half a mile from the development. Using the Huntly Place connection from the development, residents will be able to take a thirteen-minute walk to Coventry Oak Elementary without ever accessing either Citation Boulevard or Georgetown Road. The Rise STEM Academy for Girls, a public magnet school, is also less than a mile from the site.

Public transit is also easily and quickly accessible for future residents of this development. Currently, LexTran has an established stop at the corner of Citation Boulevard and Georgetown Road. Sidewalks from the inside of the development will provide residents with a short walk to this transportation option. Lexington has also added significant infrastructure to Citation Boulevard and connecting major corridors to better support bike transit into Lexington.

**b. An R-4 medium-high density zone is most appropriate for this project within a New Complete Neighborhood.**

Denton Floyd's site plan proposes a medium-high density residential development type, making the high-density apartment zone (R-4) the ideal designation for the property. Because the development will include 19.4 units per acre, it is most appropriate for the medium-high density type.

**c. Development criteria.**

The site plan provided in this application to the Planning Commission addresses each of the necessary specific development criteria for the New Complete Neighborhood type. Please reference the site plan for Denton Floyd's explanations regarding how the project meets each development criteria. Criteria not specifically addressed in the plan or in this letter are inapplicable to the development and requested zone change.

**V. Conclusion.**

Thank you for considering Denton Floyd's zone change request. We are happy to answer any questions the Planning Commission may have regarding the contents of this letter.

Sincerely,

*/s/ Lexy G. Holland*

WYATT, TARRANT & COMBS, LLP

Lexy G. Holland