

**TO:** Joe Mangum, AICP – Entitlement Services  
**FROM:** Jason Pauling, AICP – Long Range Planning  
**SUBJECT:** REZ 2024-051: 2040 Comprehensive Plan Consistency  
**LOCATION:** Westpark Drive, adjacent to South I-77 (PID: 16926116)  
**DESCRIPTION:** Zoning Change Request from **ML (Manufacturing & Logistics)** to **IMU-CD (INNOVATION MIXED-USE – CONDITIONAL DISTRICT)** – 3.442 acres.

The Long-Range Division of the Planning, Design and Development Department offers the following comments on the above referenced rezoning petition. Please communicate these comments with the petitioner to the greatest extent practical and incorporate into the public hearing staff analysis report.

- I. **Plan Consistency:** This petition is **INCONSISTENT** with the 2040 Policy Map, which currently recommends **MANUFACTURING & LOGISTICS (ML)**, but is slated to be revised to recommend **COMMERCIAL (COMM)**. An amendment to the 2040 Policy Map is required based on the request to **INNOVATION MIXED-USE (IMU)**. The table below represents elements of IMU Place Types:

<b>Land Uses</b>	Typical uses include office, research and development, studios, light manufacturing, showrooms, hotels, and <b>multi-family residential</b> . Uses in this Place Type also include retail, personal services, restaurants, and bars, and limited warehouse and distribution associated with light manufacturing and fabrication. <b>Although multi-family is an allowable use within the IMU Place type, the intent behind establishing IMU is for the adaptive reuse and further advancement of employment uses within aging manufacturing areas to take precedent, and residential should be an ancillary and supportive use only.</b>
<b>Character</b>	Characterized by adaptively reused buildings and low to mid-rise single-use structures that are transitioning to vertically integrated uses in a pedestrian-oriented environment. <b>This proposal will seek to adaptively reuse an existing hotel and convert it to multi-family residential. The pedestrian-oriented environment is currently deficient, therefore for consideration of IMU, connectivity and a mix of uses should be present within walking distance</b>

<b>Mobility</b>	Innovation Mixed-Use places are accessible by higher capacity facilities such as arterials and may also include access from interstates and freight rail. Streets serve all travel modes while still accommodating large trucks along primary arterial streets. The local and collector street network is well-connected to serve sites directly and to provide good access to arterials. Truck traffic will use routes that do not impact neighborhoods or open spaces. Mobility hubs with transit stations, pick-up and drop-off areas, bike parking and share, and micro-mobility options should be provided within this Place Type to accommodate employees without access to a vehicle. Arterial streets support walking, cycling, and transit use by providing a safe and comfortable environment to reach transit stops, jobs, or nearby destinations.
<b>Building Form</b>	The typical building in Innovation Mixed-Use places is an older industrial structure that has been adaptively reused. Newer office, residential, and mixed-use buildings typically have heights up to six stories in this Place Type. New buildings are designed with active ground floor uses to support a vibrant pedestrian environment. They have tall ground floors and a high degree of transparency using clear glass windows and doors. All buildings are designed to orient to streets, whether reused or new, with prominent entrances providing pedestrian access from the public sidewalk. Buildings also orient toward existing or planned on-site open spaces and abutting parks and greenways.

II. The following criteria should be considered to approve a change to the 2040 Policy Map:



- A. **Adjacencies** – The following adjacencies are present with this petition:
  - Manufacturing & Logistics – preferred
  - Innovation Mixed-Use - preferred
  - Commercial
  - Neighborhood 2
  - Neighborhood 1 – not ideal, prefer transitional place type and effective use of buffers and tree save areas.
- B. **Location** - The following locational criteria should be considered with this petition.
  - The subject property is not within Uptown or City Center.
  - The subject property is adjacent to ML and IMU Place Types to the north and east.
  - The subject property adjoins N2 to the south and ML to the north, both of which contain existing multi-family developments.
  - The subject property directly abuts Interstate 77 but is NOT served by an arterial.
- C. **Preferred Size/Acreage**
  - Typically size for new IMU requests would be 5 acres unless the request adjoins existing IMU.

III. **Equitable Growth Framework (EGF) Support:** Please be advised of the following regarding the petitions support of the EGF Manual and Metrics *(NOTE: The EGF Analysis below is intended to provide a broad context on the metrics used in the creation of the Charlotte*

**2040 Plan. The information is not intended to weigh or provide preference to one metric versus another one).**

- A. Access to Housing – This petition **DOES NOT** lie within a housing gap but is on the fringe of one.
- B. Access to Essential Amenities, Goods & Services – **Access to Essential Amenities, Goods & Services is a high priority need in this area according to the EGF Community Reports.** There are connectivity and access issues with this proposal based solely on its location that are hard to overcome naturally, however, the site plan is suggesting ways to accommodate and improve connectivity with a sidewalk connection to Westpark Drive, and dedication of land for a future greenway along King’s Branch. The petitioner should also consider and prioritize connectivity to the south to the adjoining N2 property.
- C. Environmental Justice – Environmental Justice (EJ) seeks to minimize and equalize effects of environmental hazards among the entire community regardless of income, ethnicity, or race. Issues of environmental justice often arise from geographic or procedural inequities, **which in this case could exist based on the developments close proximity to Interstate 77 (noise), and some existing, adjacent land uses (industrial uses).**

IV: **Charlotte 2040 Goals and Objectives Metrics:** The following 2040 Comprehensive Plan Goals should be reviewed when considering this petition, with those **HIGHLIGHTED** being advanced by the petition:

	<p><b>Goal 1: 10-Minute Neighborhoods</b> – All Charlotte households should have access to essential amenities, goods, and services within a comfortable and tree-shaded 10-minute walk, bike, or transit trip by 2040. <b>The petitioners are striving to advance this goal with a conditional plan that shows sidewalk connections to Westpark, and greenway dedication along King’s Branch. These improvements should be required as conditions should City Council approve this request.</b></p>
	<p><b>Goal 3: Housing Access for All</b> – Charlotte will ensure opportunities for residents of all incomes to access affordable housing through the preservation of naturally occurring affordable and workforce housing and increasing the number of affordable and workforce housing units through new construction. <b>By converting an existing hotel with high vacancy rates to a more sustainable and permanent form of multi-family housing is a natural way to influence and advance affordable and workforce housing.</b></p>