

**TO:** Joe Mangum, AICP, Entitlement Services  
**FROM:** Jason Pauling, AICP, Long Range Planning  
**SUBJECT:** RZP 2026-027: 2040 Comprehensive Plan Consistency  
**LOCATION:** 5824 Wilkinson Blvd. (PID's: 05536937, 38, 39, 41, 43, 06128101, 05, 06, 08, 10, 11, 06128204, 06, 07, 08)  
**DESCRIPTION:** Zoning Change Request from RAC to CAC-1(CD) and CG(CD)  
**ACREAGE:** 39.41 acres  
**DATE:** 8/4/2026

The Long-Range Division of the Planning, Design and Development Department offers the following comments on the above referenced rezoning petition.

#### RECOMMENDATION SUMMARY

- The petition is **partially consistent** with the goals and policies of the [West Inner](#) Community Area Plan.
- The petition is **partially consistent** with the goals and policies of the [West Outer](#) Community Area Plan.
- The petition is **not in alignment** with the [Charlotte Future 2040 Policy Map](#) recommendation for the Regional Activity Center Place Type

#### 1. West Inner, West Outer Community Area Plan (CAP), and 2040 Comprehensive Plan Goals:

A change in zoning from RAC to CG does not facilitate priority goals for the West Inner, West Outer, or 2040 Comprehensive Plan in its current form. There are key recommendations from both areas that suggest transitioning Commercial Place Types to other mixed-use or job generating Place Types to align with more goals and the equitable growth framework model. Regardless of Place Type or Zoning designations, development of these properties should fully realize the aspirations of supporting the vision outlined in the Community Area Plans to create complete communities that align growth with infrastructure capacity and creating vibrant, mixed-use centers that are accessible to all. Although the petition limits certain uses

**Commented [MC1]:** plans

**Commented [MC2]:** encourage

**Commented [MC3]:** the prioritized

**Commented [MC4]:** EGF + Place Types should always be capitalized

**Commented [MC5]:** Is it really "regardless"? That makes it sound like Place Types + Zoning aren't that important.

I'd remove the opening clause and just state that future development should realize...

allowed by commercial zoning, commercial place types are primarily car-oriented destinations that include drive-through and quick stop facilities that could detract from the aspirations of mixed-use geographies.

For the proposed CAC portion, the petition could facilitate the following priority goals for the West Inner and West Outer Community Area Plans:

### Goal 1: 10-Minute Neighborhood

Many proposed uses included in the development notes would contribute to a 10-minute neighborhood concept near a future transit station. However, this property would not and cannot be developed as intensely as RAC due to the proximity of the airport runway, and therefore, 1) residential uses would not be allowed, and 2) heights would be restricted. With those restrictions, a walkable activity center could still work in this area with the appropriate design and uses.

### Goal 4: Transit and Trail-Oriented Development

The provided site plan and development notes include reservation of right-of-way for future CATS Silver Line along Wilkinson Boulevard, as well as a transit station at the southwestern edge. The petitioner has agreed to continue coordinating with CATS and the Metropolitan Public Transportation Authority (MPTA) during Land Development review.

## 2. Policy Map

This petition **is not in alignment** with the Regional Activity Center (RAC) designation on the 2040 Policy Map (See Figure 1).

**Figure 1: 2040 Policy Map**



**Commented [MC6]:** always capitalize

**Commented [MC7]:** this isn't a term I've heard us use frequently. The Commercial Place Type description highlights "car oriented" and "predominately retail" which is a single use and not aligned with the mixed-use aspiration

### 3. Minor Map Amendment Criteria

The following Minor Map Amendment Criteria (MMAC) in table 1 below is found in the adopted [Policy Map Manual](#) of the Program Guide for all CAPs, and applicable for a request to change to both **Community Activity Center (CAC)**, and **Commercial (COMM)** place types:

**Table 1: Minor Map Amendment Criteria**

| Criteria                       | CAC                                                                                                                                                                                                                  | COMM                                                                                                                                                                                                                            | Does the petition meet the criteria?                                                                                                                                                                                                                                                     |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Minimum Acreage Preferred      | 20 acres                                                                                                                                                                                                             | 10 acres                                                                                                                                                                                                                        | The petition has about 17-18 acres of CAC, and close to 20 acres of Commercial.                                                                                                                                                                                                          |
| Preferred Place Type Adjacency | N2; NC; COMM; RAC; CAMP; IMU; ML                                                                                                                                                                                     | N2; CAC; RAC; CAMP; IMU; ML                                                                                                                                                                                                     | The petition is adjacent to RAC, IMU & ML.                                                                                                                                                                                                                                               |
| Locational Criteria            | <ol style="list-style-type: none"> <li>1. Not within uptown</li> <li>2. Within ½-mile walkshed of high-capacity transit station or a major transportation corridor</li> <li>3. Within EGF Gap of any type</li> </ol> | <ol style="list-style-type: none"> <li>1. Not within uptown</li> <li>2. Not within ½-mile walkshed of high-capacity transit station or a major transportation corridor</li> <li>3. Within an Access to Amenities Gap</li> </ol> | The petition is not within uptown, there is a proposed CATS Silver Line station proposed within the rezoning boundary. The eastern portion of the site is not within an access to goods and services gap, although the western portion (west of Little Rock Rd) is within an access gap. |

**Commented [MC8]:** specify which one since the Gap criteria for CAC + COMM aren't the same.

**Comprehensive Plan, 2040 Policy Map, and Supporting Community Areas Plans (CAP) –West Inner & Outer, adopted April 13, 2026**

• **Community Area Plan - Priority Goals of the Area Plan:**

While it is important to advance all ten of the Charlotte Future 2040 Comprehensive Plan goals across the city, some goals are more of a priority for a geography based on the community's needs for increased access and reduced impacts.

Table 2 below represents an analysis of how the petition aligns with or could facilitate the priority Comprehensive Plan Goals for the geography.

**Table 2: Community Area Plan Priority Goals**

| <b>Community Area Plan (CAP) Geography</b> | <b>Community Area Plan Priority Goal</b>     | <b>How does the petition specifically facilitate the priority goal?</b>                                                                                                                                                                                                                                             |
|--------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| West Outer                                 | Goal 1: 10-Minute Neighborhoods              | A request from RAC to COMM does not align with this Goal, but CAC would align. With the understanding that residential uses should be restricted and heights should be limited, more conditions should be considered to realize the aspirations of this area as a destination within both CAC and Commercial areas. |
| West Inner, West Outer                     | Goal 2: Neighborhood Diversity and Inclusion | A request from RAC to COMM does not align with or facilitate this Goal, but CAC would align. However, new housing development is not appropriate based on proximity to the airport and in consideration of Environmental Justice policies related to noise impacts.                                                 |
| West Inner, West Outer                     | Goal 3: Housing Access for All               | Housing development is not appropriate based on proximity to the airport and in consideration of Environmental Justice policies related to noise impacts.                                                                                                                                                           |

**Commented [MC9]:** can you provide one or two examples of what's most important? maybe a commitment to a mix of uses and something else?

**Commented [MC10]:** just a suggestion...

You might say that while these are priority goals for the plan geography, they're not applicable on this specific site due to the proximity to airport and EJ concerns

|                        |                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| West Inner, West Outer | Goal 4: Transit- and Trail-Oriented Development (2T-OD) | A request from RAC to COMM does not align with this Goal, but CAC does align. With a proposed high-capacity station planned within this area, uses and standards of both place types should develop in close proximity of the station to the greatest extent practical and limit auto dependent uses away from the transit station.                                                                                                                                                                                                                                       |
| West Inner             | Goal 6: Healthy, Safe and Active Communities            | A request from RAC to COMM potentially does not align with this Goal whereas Commercial place types may include more traffic in and out of sites that further impact carbon emissions and create more conflicts between cars, pedestrians and cyclists. All development should minimize these impacts to the greatest degree practical                                                                                                                                                                                                                                    |
| West Inner             | Goal 7: Integrated Natural and Built Environments       | A request from RAC to COMM potentially does not align with this Goal whereas Commercial place types may include more impervious surface, more cars and traffic in and out of sites that further impact carbon emissions. Conditional notes provided by the petitioner have identified an enhanced amenity area on each side of Josh Birmingham Pkwy. This space should be easily accessible, and buildings should front on the open space to the highest degree practical. Development within the CAC area should align with this goal and form near the transit station. |

**Commented [MC11]:** do you want to add that uses should develop in close proximity and be well connected with sidewalks?

**Commented [MC12]:** Commercial may also have fewer street tree and less ambitious sidewalk aspirations which paired with auto-oriented development do not align with the goal

|            |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| West Outer | Goal 8: Diverse and Resilient Economic Opportunity | Some commercial uses have limitations on creating jobs, whereas activity centers are particularly noted to provide major employment locations and cultural destinations for residents throughout Charlotte. Conditional notes provided have limited some commercial uses that may not be appropriate, such as vehicle sales and services and accessory outdoor storage, and limits on the number of drive-through facilities / lanes, or conditions that these facilities will be placed away from plazas, open spaces and centers of activity. |
|------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Commented [MC13]:** because primarily single-use retail (which is limiting compared to mixed

## 2040 Policy Map



Table 3 represents an analysis of Alignment with the 2040 Policy Map.

**Table 3: Alignment with the 2040 Policy Map**

| 2040 Policy Map Place Type Designation | Petition Consistency |
|----------------------------------------|----------------------|
|----------------------------------------|----------------------|

|                                |                                                                                                                                                                                                         |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| REGIONAL ACTIVITY CENTER (RAC) | <b>NOT IN ALIGNMENT WITH</b> the recommendation for RAC. If the petition is approved, the place type for the site would likely be revised to <b>COMMUNITY ACTIVITY CENTER &amp; COMMERCIAL (COMM)</b> . |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Table 4 represents an analysis of the components of the proposed **COMMUNITY ACTIVITY CENTER (CAC) & COMMERCIAL (COMM)** and Place Types.

**Table 4: Place Type Components**

| Place Type Component | CAC Place Type Components                                                                                                                                                                                                                                              | COMM Place Type Components                                                                                                                                                 | How does the petition specifically meet the Place Type Component?                                                                                                                                                                                                                                                                             |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Land Uses</b>     | Typical uses are retail, restaurant, entertainment, and personal services. Some multi-family and office may also be in this Place Type. Some types of auto-oriented uses, well-designed to support walkability, may be located outside of the core of this Place Type. | Typical uses include shopping centers, standalone retail uses, personal services, hotels, restaurants, and service stations.                                               | The petition includes conditional notes that prohibit residential uses, and the following uses: Adult electronic gaming, adult uses, amusement facility (outdoor), nightclub, vehicle dealerships, vehicle rental, vehicle repair facility, accessory outdoor storage.                                                                        |
| <b>Character</b>     | This Place Type is characterized by low to mid-rise commercial, residential, civic/institutional, and mixed-use buildings in a pedestrian-oriented environment. CACs in Transit Station Areas are typically more intensely developed than CACs in other locations.     | This Place Type is characterized by low-rise retail structures with a walkable, landscaped public realm that balances automobile, bicycle, and pedestrian design elements. | Conditional notes provided include supplemental design standards for drive-through establishments per the UDO, and limit drive-throughs to the rear or side of the buildings, but not enough information is provided to determine if the character of the proposed area is truly walkable. An enhanced amenity area is proposed on both sides |

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|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | of Josh Birmingham Pkwy, which should be easily accessible with buildings fronting on open space or plazas to the greatest extent practical. A site plan and/or conditions are recommended to show compliance with elements of the RAC to be something staff could support.                                                                                                                                       |
| <b>Mobility</b> | CACs include a transportation network that supports accessible 10-min neighborhoods and a "park once" environment. CACs are located at or near key intersections or along arterials with transit service. Easy access and direct connections to nearby neighborhoods help reduce trip lengths, keeps cars off arterials, and encourage transit use, walking, or biking. The street network is well-connected with small blocks and walkable connections along streets and between destinations. There are frequent opportunities to cross arterials and the pedestrian network accommodates large groups of people. Mobility hubs with transit stations, pick-up and drop-off areas, bike parking and | Typically located along high-volume streets, limited access roadways, and near interchanges. Uses are generally auto-oriented and streets are designed to accommodate safe and comfortable travel by all modes. Cross-access between adjoining sites limits the number of driveways off arterials which improves the public realm & circulation. Arterials support walking, cycling, and transit use by providing a safe and comfortable environment to reach transit stops, jobs, or nearby destinations. | Conditional notes provided include some details for prohibited uses, and supplemental design standards for drive-through establishments, but not enough information is provided to determine safe and comfortable travel, or cross-access for all modes of travel is accommodated. A site plan and/or conditions are recommended to show compliance with elements of the RAC to be something staff could support. |

**Commented [MC14]:** Is this something the LR + ES Staff discuss and agree on? If so, keep. If not, feels a little outside our lane.

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|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | sharing, and micro-mobility options should be provided within this Place Type to accommodate the high-level non-vehicular traffic.                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Building Form</b> | Typical buildings are five to seven stories. Some buildings in transit station areas are taller. Buildings are designed with active ground floor uses to support a vibrant pedestrian environment with a high degree of transparency.                                                                                                               | Typical building height is four or fewer stories. Some sites include accessory drive through facilities and gas pumps. Buildings include entrances on the street-facing side(s) to provide pedestrian access from the public sidewalk.                                                         | Building heights will be limited across both places based on proximity to the airport. Conditional notes provided include supplemental design standards for drive-throughs per the UDO, but not enough information is provided to determine if the building form of the area is truly compatible. Builders are encouraged to provide a more detailed site plan to show compliance with elements of the RAC to be something staff could support. |
| <b>Open Space</b>    | Improved open space is a key feature of CACs, whereas they include numerous improved open spaces such as plazas, patios, and courtyards that may include landscaping. Public open spaces such as small parks & greenways, and natural open spaces such as tree preservation areas, are also an important feature and should be included in centers. | Commercial place types should include improved open spaces such as plazas, patios, and courtyards that may include landscaping. Natural open spaces and tree preservation areas are also found and encouraged here. Landscaping provides an attractive public realm by softening street edges. | An enhanced amenity area is proposed on both sides of Josh Birmingham Pkwy, which should be easily accessible with buildings fronting on open space or plazas to the greatest extent practical.                                                                                                                                                                                                                                                 |

**Commented [MC15]:** Does the plan state what max height will be?

- **Community Area Plan - Supporting the Vision Policy and Assessment Recommendation Review**

Supporting the Vision section outlines adopted and recommended policies, regardless of Place Type designations, to help guide decisions for Mobility, Open Space, Environmental Justice & Sustainability, Community Character and Public Facilities & Services.

The Mobility, Open Space and Community Character Assessments apply to petitions within an area designated by the 2040 Policy Map as an activity center. To fully realize the aspirations of those mixed-use Place Type recommendations and advance Charlotte's goals, future development should help further aspirations related to Mobility, Open Space and Community Character.

Table 5 below represents an analysis of how the petition meets the policy recommendations. These policies are specifically tracked for rezoning petitions.

**Table 5: Policy Recommendations**

| <b>Policy Recommendation</b>                                                                                                                                                                                              | <b>How does the petition specifically meet the policy?</b>                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Open Space<br>OS-1: To increase access to open space, ensure new development/redevelopment provides enhanced open space(s), as encouraged by the designated Place Type and required by the Unified Development Ordinance. | An enhanced amenity area is proposed on both sides of Josh Birmingham Pkwy, which should be easily accessible with buildings facing open space or plazas to the greatest extent practical. Future developers within the CAC area should also maximize open space and public plazas to the greatest extent practical |

|                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Environmental Justice</p> <p>EJ-1: To ensure future residents do not live near undesirable or unhealthy land uses, discourage residential development/redevelopment in areas designated Manufacturing &amp; Logistics. When existing Manufacturing &amp; Logistic sites are adjacent to residential development and request new entitlements, approve the least intense zoning district (ML-1).</p> | <p>Residential development is prohibited by the petition and based on proximity to the airport.</p>                                                                               |
| <p>Environmental Justice</p> <p>EJ-2: To ensure compatible land uses near industrial land uses, encourage Commercial or Innovation Mixed-Use development/redevelopment adjacent to areas designated Manufacturing &amp; Logistics.</p>                                                                                                                                                                 | <p>The petition proposes commercial uses near Manufacturing &amp; Logistics and Innovation Mixed Use places, near the interstate, and away from residential zoning districts.</p> |
| <p>Environmental Justice</p> <p>EJ-8: To reduce brownfields and hazardous sites, the City should consider adjacent Place Type designations and preferred adjacencies, as outlined in the Policy Map Manual, when approving new land uses for redeveloped "Areas of Environmental Concern."</p>                                                                                                         | <p>N/A</p>                                                                                                                                                                        |
| <p>Community Character</p> <p>CC-5: To retain neighborhood culture and identity, Charlotte should use pattern books and regulatory tools such as neighborhood character overlays, historic districts, and other community-driven strategies to guide residential infill development.</p>                                                                                                               | <p>N/A</p>                                                                                                                                                                        |
| <p>Public Facilities</p> <p>PS-4: To ensure delivery of adequate public services, align Charlotte's annexation policy with public facility needs.</p>                                                                                                                                                                                                                                                  | <p>N/A</p>                                                                                                                                                                        |

**Commented [MC16]:** Should this be N/A since the petition isn't proposing ML next to Neighborhood?

- **Assessment Recommendations (Petitions within an Activity Center or IMU)**

Table 6 below represents an analysis of how the petition does/ does not align with the aspirational goals for the RAC Place Type.

**Table 6: Policy Recommendations (Petitions inside an Activity Center or IMU)**

| Assessment Recommendation                                                                                                                                 | Does the petition specifically meet the recommendation?                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mobility<br>Help provide a pedestrian network that is complete, direct, safe and comfortable and designed to accommodate significant pedestrian activity. | A change from RAC to CAC in this area could be more compatible based on limits of development intensity, heights, and exclusion of residential. Generally, a change from RAC to COMM does not align with or facilitate this policy, unless a site plan or conditions are included that can confirm safe, comfortable and equitable mobility options to the highest degree practical. |
| Mobility<br>Help provide a “park once” and walk development or other mobility options between destinations.                                               | Changing the policy map from RAC to CAC remains consistent with this policy, however RAC to COMM could go against this policy. In particular, the presence of drive-through facilities designed for quick in and out service does not promote a “park once” environment.                                                                                                             |
| Mobility<br>Help provide a center that is easily accessible via transit, and transit facilities located and designed to support accessibility.            | Changing the policy map from RAC to CAC remains consistent with this policy, however RAC to COMM could go against this policy. With a high-capacity transit stop is planned for this area, more uses and developments should be as fully accessible to all modes of travel as possible.                                                                                              |

|                                                                                                                                           |                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Open Space & Environmental Justice<br>Help provide a public open space that is accessible within a 10-minute walk within the development. | An enhanced amenity area is proposed on both sides of Josh Birmingham Pkwy, which should be easily accessible with buildings facing open space or plazas to the greatest extent practical. Developers should also maximize open space and public plazas within the CAC area to the greatest extent practical. |
|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|