

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 and CG(CD)
ACREAGE: 39.41 acres
DATE: 5/6/2026

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 **inconsistent** with the [goals and policies of the West Inner Community Area Plan](#).

The petition is **inconsistent** 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

WEST INNER & WEST OUTER COMMUNITY AREA PLAN, AND 2040 COMPREHENSIVE PLAN GOALS

The petition does not facilitate priority goals for the West Inner, West Outer, or Charlotte Future 2040 Comprehensive Plan in its current form. Furthermore, there are key recommendations from both area plans referenced in the Future Place Types & Anticipated Change sections 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 and while the petition in its current form does not facilitate any goals, development of these properties should fully realize the aspirations of supporting the vision outlined in the Community Area Plans and Future 2040 Plan 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 allowed by commercial zoning, commercial place types are primarily car-oriented destinations that include drive-through and quick stop

facilities that detract from the aspirations of mixed-use geographies. Based on the location, a Place Type that aligns with more goals of both the West Inner and Outer Community Area Plans, and the 2040 Comprehensive Plan is recommended, or a detailed site plan and additional conditions with elements of RAC place types should be included to support better alignment with the area and comprehensive plan goals.

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



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 the to **Commercial (COMM)** place type:

Table 1: Minor Map Amendment Criteria

Criteria for Commercial	Description	Does the petition meet the criteria?
Minimum Acreage Preferred	10 acres	Yes, the petition meets the minimum acreage.

Preferred Place Type Adjacency	N2; CAC; RAC; CAMP; IMU; ML	The petition is adjacent to RAC, IMU & ML.
Locational Criteria	<p>All required:</p> <ul style="list-style-type: none"> • Not within uptown • Not within ½-mile walkshed of high-capacity transit station or within a ½-mile of a major transportation corridor • Within an Access to Amenities Gap 	Although 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.

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

Community Area Plan (CAP) Geography	Community Area Plan Priority Goal	How does the petition specifically facilitate the priority goal?
West Outer	Goal 1: 10-Minute Neighborhoods	A request from RAC to COMM does not align with or facilitate this Goal. With the understanding that residential uses should be restricted, and heights should be limited, more conditions should be considered to fully realize the aspirations of this area as a destination.

West Inner, West Outer	Goal 2: Neighborhood Diversity and Inclusion	A request from RAC to COMM does not align with or facilitate this Goal. However, new housing development may not be 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	A request from RAC to COMM does not align with or facilitate this Goal. However, housing development may not be appropriate based on proximity to the airport and in consideration of Environmental Justice policies related to noise impacts.
West Inner, West Outer	Goal 4: Transit- and Trail-Oriented Development (2T-OD)	A request from RAC to COMM does not align with or facilitate this Goal. With a proposed high-capacity station planned within this area, many uses and standards of commercial place types and zoning would potentially detract from station area plans.
West Inner	Goal 6: Healthy, Safe and Active Communities	A request from RAC to COMM potentially does not align with or facilitate 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.

West Inner	Goal 7: Integrated Natural and Built Environments	<p>A request from RAC to COMM potentially does not align with or facilitate 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.</p>
West Outer	Goal 8: Diverse and Resilient Economic Opportunity	<p>Some commercial uses have limitations on creating jobs, whereas Regional Activity Centers are particularly noted to provide major employment locations and cultural destinations for residents throughout the Charlotte region. Conditional notes provided by the petitioner have limited some of those uses, such as vehicle sales and services and accessory outdoor storage, but a limit on the number of drive-through facilities and other conditions, and/or a detailed site plan should reflect elements of RAC place types.</p>

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)	NOT IN ALIGNMENT WITH the recommendation for RAC. If the petition is approved, the place type for the site would likely be revised to COMMERCIAL (COMM) .

Table 4 below represents an analysis of the components of the proposed **COMMERCIAL (COMM)** Place Type.

Table 4: Place Type Components

Place Type Component	Place Type Component Description	How does the petition specifically meet the Place Type Component?
Land Uses	Typical uses include shopping centers, standalone retail uses, personal services, hotels,	The petition includes conditional notes that prohibit the following uses: Adult electronic gaming, adult uses, amusement facility (outdoor), nightclub, vehicle dealerships,

	restaurants, and service stations.	vehicle rental, vehicle repair facility, accessory outdoor storage.
Character	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 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.
Mobility	Commercial places are typically located along high-volume arterial streets, limited access roadways, and near interstate interchanges. While uses and sites are generally automobile-oriented, streets are designed to accommodate safe and comfortable travel by all modes of travel. Cross-access between adjoining sites limits the number of driveways off arterial streets, thereby improving the public realm and circulation. Arterial streets support walking, cycling, and	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.

	transit use by providing a safe and comfortable environment to reach transit stops, jobs, or nearby destinations.	
Building Form	The 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.	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 building form of the area is truly compatible. A site plan and/or conditions are recommended to show compliance with elements of the RAC to be something staff could support.
Open Space	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. A site plan and/or conditions are recommended to show compliance with elements of the RAC to be something staff could support.

- **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

Policy Recommendation	How does the petition specifically meet the policy?
<p>Open Space 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.</p>	<p>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.</p>
<p>Environmental Justice EJ-1: To ensure future residents do not live near undesirable or unhealthy land uses, discourage residential development/redevelopment in areas designated Manufacturing & Logistics. When existing Manufacturing & 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 EJ-2: To ensure compatible land uses near industrial land uses, encourage Commercial or Innovation Mixed-Use development/redevelopment adjacent to areas designated Manufacturing & Logistics.</p>	<p>The petition proposes commercial uses near Manufacturing & Logistics and Innovation Mixed Use places, near the interstate, and away from residential zoning districts.</p>

Environmental Justice 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."	N/A
Community Character 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.	N/A
Public Facilities PS-4: To ensure delivery of adequate public services, align Charlotte's annexation policy with public facility needs.	N/A

- **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 Help provide a pedestrian network that is complete, direct, safe and comfortable and designed to accommodate significant pedestrian activity.	Generally, changing the Policy Map 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 regardless of place type designation.

<p>Mobility Help provide a “park once” and walk development or other mobility options between destinations.</p>	<p>Changing the policy map from RAC to COMM goes 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.</p>
<p>Mobility Help provide a center that is easily accessible via transit, and transit facilities located and designed to support accessibility.</p>	<p>Changing the policy map from RAC to COMM goes against this policy. In particular, a high-capacity transit stop is planned for this area and not enough information is provided to conclude that all uses within this center are fully accessible.</p>
<p>Open Space & Environmental Justice Help provide a public open space that is accessible within a 10-minute walk within the development.</p>	<p>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.</p>