REZONING REQUEST: RZ-2018-001

CITY OF SUWANEE REZONING ANALYSIS

CASE NUMBERS: RZ-2018-001

REQUEST: R-100 (SINGLE FAMILY RESIDENTIAL) TO

RM-6 (RESIDENTIAL MULTI-FAMILY

DUPLEX DISTRICT)

LOCATION: 641 EVA KENNEDY ROAD

TAX ID NUMBER: 7-237-008

ACREAGE: APPROXIMATELY 18.1 ACRES

PROPOSED DEVELOPMENT: SINGLE FAMILY ATTACHED TOWNHOMES

APPLICANT: SPARTAN INVESTORS I, LLC

1550 N. BROWN ROAD, SUITE 125 LAWRENCEVILLE, GEORGIA 30043

OWNER: SUWANEE FIRST BAPTIST CHURCH

641 EVA KENNEDY ROAD SUWANEE, GEORGIA 30024

CONTACT: SHANE LANHAM PHONE: 770-232-0000

RECOMMENDATION: DENIAL

PROJECT DATA:

The applicant requests a rezoning from R-100 (Single Family Residential) to RM-6 (Residential Multi-family Duplex District) to allow for the development of 93 townhomes. The subject property is approximately 18.1 acres.

The subject property is a large tract of land located along Eva Kennedy Road between existing small single family homes on large tracts of land. The property is zoned R-100 (Single Family Residential) like the properties directly adjacent to the property on both sides and the properties across the street, which are also occupied by existing single family homes.

An approximately 150 foot utility powerline easement and a stream bisect the property at roughly the same location, separating the northern third of the property from the southern portion of the property that is adjacent to Eva Kennedy Road. The property is currently occupied by a church, an off street parking lot, and storage building, which sit on the developed portion of the site to the south of the powerlines. The portion north of the powerlines backs up to commercial property that fronts Peachtree Industrial Boulevard and is occupied by an auto repair shop and a cell tower. The northern portion is undeveloped and wooded.

The northern portion of the site touches two other properties that are currently undeveloped. To the east is an approximately 35 acre tract of land zoned M-1 that has frontage on Peachtree Industrial Boulevard and Stonecypher Road and backs up to the Stonecypher neighborhood where there is a road stubbed to the M-1 property for a future connection. To the west is property that was recently rezoned to RM-8 for the development of 49 townhomes with access to Peachtree Industrial Boulevard.

The proposed development is focused on the front portion of the property south of the powerlines and does not propose any development on the portion north of the powerlines. The development would include 93 attached single family townhomes. The project would have an overall density of 5 units per acre. The proposed units would all be rear loaded with 2 car garages accessed via rear alleys. These units would be 2-3 stories, 22 feet wide, and a minimum of 1,800 square feet. The proposed architecture would have brick front and side elevations and covered front stoops.

The development would have one entry point off of Eva Kennedy Road. The proposed streets within the development would have a 5 foot planting strip and a 5 foot sidewalk on both sides of streets and a total of 90 on-street parallel parking spaces throughout the development. A stormwater management facility would be located at the rear of the proposed development adjacent to the power line easement and stream. There are no formal open spaces or amenity areas proposed.

DEVELOPMENT COMMENTS:

The RM-6 zoning would require a 50 foot undisturbed buffer along adjacent R-100 properties to the east and west. The proposed development would require a variance from the Zoning Board of Appeals to reduce this buffer to a 30 foot graded and replanted buffer on the east side and a 10 foot graded and replanted buffer on the west side as shown in the proposed plan. The RM-6 zoning also requires a 50 foot setback from the right-of-way. Additional variances would be required to locate homes closer to Eva Kennedy as shown in the proposed plan.

ANALYSIS:

The applicant requests a rezoning of the subject property from R-100 (Single Family Residential) to Residential Multi-family Duplex (RM-6). The RM-6 zoning district is intended for residential development at a maximum density of 6 units per acre. RM-6 allows for single family attached, duplexes, triplexes, quadruplexes, and multifamily dwelling units. In this case, the purpose of the applicant's request is to build townhomes; therefore, the request is for RM-6 zoning that would limit the use of the property to 93 single family attached townhomes. The density of the proposed development would be approximately 5 units per acre.

Although the proposed housing product appears to be of high quality and consistent with other townhome architecture found in the City, townhomes are not a compatible use for this location and the proposed development is inconsistent with the Comprehensive Plan, the existing rural character of Eva Kennedy Road, and the surrounding single family uses.

Both the 2030 Comprehensive Plan and the Downtown Suwanee Master Plan indicate an institutional use for the subject property as the future land use. This reflects the continued use of the site for a church. However, the other properties that front Eva Kennedy Road including the properties directly adjacent to and across the street from the subject property are prescribed to maintain a single family detached use in both plans. Furthermore, the 2030 Comprehensive Plan states that "infill development or redevelopment could occur on existing large lots (in Old Town) but should be targeted toward single-family detached or duplex housing designed as a single large home" (2030 Comprehensive Plan, p. 101-102). The proposed homes are attached townhomes, and not single family detached as the Comprehensive Plan states should be the future land use.

The proposed development is out of character with surrounding development and would compromise the rural aesthetic and small town feel of nearby properties. The subject property is located in the heart of Old Town, Suwanee's original residential community. The Old Town Character Area requires a very sensitive approach to growth. The goals of the 2030 Comprehensive Plan for Old Town include adding infill development, preserving the existing historic and rural character, and increasing opportunities for senior housing (2030 Comprehensive Plan, p. 103). A project on the subject property should aspire to do all three of these, but the proposed project would only accomplish the first.

The 2030 Comprehensive Plan states that in Old Town, "historic preservation should be balanced with new construction, and infill development encouraged but designed and built in ways that maintain and enhance the environment and unique small-town character" (2030 Comprehensive Plan, p. 99). The plan further states, "the growth strategy for Old Town should be carefully-crafted infill responding to the unique context in the historic areas" (2030 Comprehensive Plan, p. 101). "Subdivisions of larger parcels are acceptable at certain locations, but should be accomplished in a way that preserves the random spacing of existing lot frontages, a key aspect of the area's character" (2030 Comprehensive Plan, p. 102). The proposed development does nothing to further this goal.

The proposed townhome development is urban in character with no open space around or between buildings or visible from Eva Kennedy Road. This does not maintain the small town character of Old Town or acknowledge the historic or rural context of Eva Kennedy Road. The applicant proposes to develop approximately half the property (+/- 8.5 acres) and leave approximately 9.5 acres as open space. However, this open space does not include any usable open space. The open space area includes the undeveloped portion of the property north of the stream and powerlines, the powerline easement itself, and the proposed storm water management facility. None of these areas would be amenities to the neighborhood or even accessible from the neighborhood.

The 2015 Downtown Suwanee Master Plan acknowledges that the existing historic rural development pattern "does not preclude the development of diversified building forms, such as attached residential or accessory dwellings, so long as they are designed to blend with existing adjacent residences. New residences should be compatible with existing architectural forms, particularly in regard to scale, massing, and design details" (2015 Downtown Suwanee Master Plan, p. 23). The proposed development is not compatible with the scale, massing or design of existing development in Old Town.

In addition to lack of compatible, use, architectural character and open space, the proposed project does not connect to any other portion of the City and would only have one access point off of Eva Kennedy Road, which would force all traffic from the neighborhood to use Eva Kennedy Road instead of dispersing traffic in multiple directions. It is the philosophy of the City to connect developments to one another to shorten the length of local vehicular trips and make Town Center and Old Town more walkable. The subject property is a key piece of the larger transportation puzzle to provide connectivity in Old Town. The property to the west of the northern portion of the subject property was recently rezoned for townhomes. The concept plan for this future development includes extending a road and sidewalks to the property line of the subject property to set up the potential for a future connection that would extend all the way to Eva Kennedy from Peachtree Industrial Boulevard as envisioned in the 2030 Comprehensive Plan. Not only does the proposed development not connect to anything else, it would prohibit this desired future connection.

In conclusion, the requested rezoning of RM-6 is not appropriate for this location. While townhomes on the northern portion of the subject property could provide a good transitional use between the more intense commercial development along Peachtree Industrial Boulevard and the existing single family homes along Eva Kennedy Road, the development of townhomes fronting Eva Kennedy Road in the Old Town single family area of Suwanee among existing single family homes is not appropriate or supported by the Comprehensive Plan. The proposed development is out of character with surrounding development and would compromise the rural aesthetic of nearby properties. Furthermore, the proposed development would prohibit desirable connections to be made in this area of Old Town that are prescribed in the Comprehensive Plan to achieve a more connective and walkable future local street network. As such, the Planning Department recommends **DENIAL** of **RZ-2018-001**.

Recommended Conditions

RZ-2018-001

The Planning Department recommends denial of the request; however, if the City Council chooses to approve the request to rezone the subject property to RM-6, the following conditions are recommended:

- 1. Prior to application for development review, submit to the City a concept plan for review of compliance with conditions of zoning. Development shall conform to said concept plan.
- 2. Development shall be limited to a maximum of 93 residential units. Development shall be limited to single family attached or detached development on the north side of the power line easement. Development shall be limited to single family detached development with a maximum of 4 units per acre on the south side of the power line easement.
- 3. The north and south side of the power lines should be developed as one cohesive neighborhood connected through the powerline easement with at least one street. This street should connect to the adjacent properties to the east (parcel 7-237-396) to the west (parcel 7-236-093) and to the north (parcel 7-251-009) via a continuous street network.
- 4. New streets shall be publicly dedicated. Minimum 5 foot wide sidewalks shall be provided on both sides of all streets. Trees shall be planted on 40 foot centers within a 5 foot wide minimum planting strip located between the curb and the sidewalk. Trees shall have a minimum caliper of 3 inches. A root barrier shall be planted with all trees adjacent to a sidewalk. Final design of the roads shall be approved by the City Engineer. Alleys shall be private and are subject to the approval of the City Engineer.
- 5. Provide on-street 8 feet wide parallel parking delineated by bulb-outs.
- 6. A minimum of 1/2 acre of usable open space and/or amenity area shall be provided for the development. Said space shall be a usable open space that provides a focal point for the development. Said space shall be completed prior to approval of any final plat for the project.
- 7. Development Standards:
 - A. Single Family Attached shall be subject to the following development standards:
 - i. Attached homes shall be located on fee simple lots with a minimum width of 22 feet.
 - ii. Minimum unit size: 1,800 square feet
 - iii. Maximum building height: 35 feet
 - iv. Minimum front yard: 5 feet from the back of the sidewalk but not within the right-of-way
 - v. Minimum rear yard: 5 feet
 - vi. Minimum building separation: 20 feet

- vii. Minimum parking required: 2 spaces per units within a garage
- viii. Minimum driveway length: 22 feet long
- B. Single Family Detached shall be subject to the following development standards:
 - ix. Minimum lot width: 35 feet
 - x. Minimum lot size: 2,500 square feet
 - xi. Minimum unit size: 1,800 square feet
 - xii. Maximum building height: 35 feet
 - xiii. Minimum front yard: 5 feet from the back of the sidewalk but not within the right-of-way
 - xiv. Minimum rear yard: 5 feet
 - xv. Minimum side yard setback: 0 feet
 - xvi. Minimum building separation: 10 feet
 - xvii. Minimum parking required: 2 spaces per unit within a garage.
 - xviii. Carriage homes shall be allowed as an accessory use on single family detached lots larger than 4,000 square feet subject to the following standards:
 - a. Minimum unit size: 800 square feet
 - b. Maximum building height: 2 stories
 - c. Building or structure shall comply with section 604.A, B, and C of the City of Suwanee Zoning Ordinance.
 - d. Exterior finish shall be consistent with the finish of the primary residence.
- 8. Architecture for all single family attached units shall be 3-sided brick units similar to those shown in "Exhibit B." Final architecture for all units shall be subject to the approval of the Planning Department.
- 9. Architecture for all single family detached units shall be subject to the approval of the Planning Department.
- 10. All single family attached units should have a front stoop or porch between 18 inches and 6 feet above the grade of the sidewalk in front of the unit.
- 11. All single family detached units should have a porch between 18 inches and 3 feet above the grade of the sidewalk in front of the unit. Said porch shall be a minimum of 6 feet deep and 120 square feet in size.
- 12. All residential units shall have rear-loaded garages that are accessed via rear alleys.
- 13. Provide landscaping to screen all rear-loaded driveways from view of public or private streets. Plants used for this shall be anticipated to grow to a minimum of 4 to 6 feet in height. Landscaping shall be approved by the City of Suwanee Planning and Inspections Director.
- 14. Provide within an access easement a 10 foot wide multi-use path within the powerline easement from one end of the property to the other.

Standards Governing Exercise of Zoning Power

Pursuant to Section 2006 of the City of Suwanee Zoning Ordinance, the City finds the following standards are relevant in balancing the interest in promoting the public health, safety, morality, or general welfare against the unrestricted use of property and shall govern the exercise of the zoning power therewith.

A. Whether the zoning proposal will permit a use that is suitable in view of the use and development of adjacent and nearby property;

The proposed rezoning for the construction of townhomes would permit a use that is not suitable in view of adjacent and nearby single family homes.

B. Whether the zoning proposal will adversely affect the existing uses or usability of adjacent or nearby property;

The proposed rezoning for townhomes as proposed could adversely affect the existing single family homes on Eva Kennedy Road by changing the character of this semi-rural single family portion of Old Town Suwanee.

C. Whether the property to be affected by the zoning proposal has a reasonable economic use as currently zoned;

The subject property has a reasonable economic use as currently zoned.

D. Whether the zoning proposal will result in a use which will or could cause an excessive or burdensome use of existing streets, transportation facilities, utilities or schools;

Approval of the request likely would not result in excessive or burdensome use of existing streets, transportation facilities, utilities or schools.

E. Whether the zoning proposal is in conformity with the policy and intent of the Land Use Plan;

The 2030 Comprehensive Plan prescribes single family detached homes for the parcels along Eva Kennedy Road.

F. Whether there are other existing or changing conditions affecting the use and development of the property which give supporting grounds for either approval or disapproval of the zoning proposal;

The draft 2040 Comprehensive Plan has not yet been adopted, but the proposed 2040 Future Land Use Plan refines the desired future land use for the subject property in anticipation that the current use as a church may not remain. The proposed 2040 Future Land Use Plan prescribes Single Family on the portion of the property south of the powerlines and Mixed-Use Village on the portion of the property north of the power lines as a transition between single family along Eva Kennedy Road and Commercial along Peachtree Industrial Boulevard.

REZONING APPLICATION

AN APPLICATION TO AMEND THE OFFICIAL ZONING MAP OF CITY OF SUWANEE, GEORGIA

AN AFFLICATION TO AMEND THE OFFICIAL	LOTHING MITH OF CITT OF SO WITH LEE, GE	OROM
APPLICANT INFORMATION*	OWNER INFORMATION*	
Spartan Investors I, LLC c/o Mahaffey Pickens NAME: Tucker, LLP	NAME: Suwanee First Baptist Church c/o Gera	ald Tanton
ADDRESS:	ADDRESS: 641 Eva Kennedy Rd	
1550 N Brown Rd, Ste 125	Suwanee, GA 30024	
Lawrenceville, GA 30043		
PHONE: 770,232.0000	PHONE: 770.232.0000	
CONTACT PERSON: Shane Lanham CO	NTACT PHONE: 770.232.0000	
EMAIL ADDRESS: slanham@mptlawfirm.com FA	AX NUMBER: <u>678.518.6880</u>	-
PROPERTY I	NFORMATION	
PRESENT ZONING DISTRICT(S): R-100 RE	EQUESTED ZONING DISTRICT RM-6	
PROPOSED DEVELOPMENT: Single-family residential	subdivision	
TAX PARCELNUMBER(S): 7237 0081		
ADDRESS OFPROPERTY: 641 Eva Kennedy Rd		
TOTAL ACREAGE: +/- 18.142 PUBLIC ROADWA	Y ACCESS: Eva Kennedy Road	
FOR RESIDENTIAL DEVELOPMENT:	FOR NON-RESIDENTIAL DEVELOPMI	ENT:
NO. OF LOTS/DWELLING UNITS: 93	NO. OF BUILDINGS/UNITS: N/A	
DWELLING UNIT SIZE (SQ. FT.): 1,800+ square feet	TOTAL GROSS SQUARE FEET; N/A	
CERTIFIED I hereby certify that the above and attached information is 2004 no reapplication on the same land which has been demonths from the date of last action unless said time period acted upon in less than 6 months from the date of last action 2003 of the Zoning Ordinance any and all conditions which property and all subsequent owners.	enied by the City Council shall be acted upon with is waived by the Council. In no case shall a reapon by the Council. I am also aware that pursuant	oplication be to Section
11/30/17		Ditt
Signature of Applicant* Shane M. Lanham, Attorney for Applicant	Signature of Owner*	Date
Print Name CAPIRES HE30 17	Print Name*	Date
Signature of Netary October 2, 2020	Signature of Notary	Date
2 2 . 00110	Complete Additional Application Form(s) ************************************	*****
WETT COUNT	**************************************	प्रान्तात्त्वा स्थापना व्यापना विकास
Date Received: Case No	22-2018-001 Accepted By:	
Date Reverse	nemonal and a second a second and a second a	

REZONING APPLICATION

AN APPLICATION TO AMEND THE OFFICIAL ZONING MAP OF CITY OF SUWANEE, GEORGIA

APPLICANT INFORMATION* Spartan Investors I, LLC c/o Mahaffey Pickens	OWNER INFORMATION*
NAME: Tucker, LLP	NAME: Suwanee First Baptist Church c/o Gerald Tanton
ADDRESS:	ADDRESS: 641 Eva Kennedy Rd
1550 N Brown Rd, Ste 125	Suwanee, GA 30024
Lawrenceville, GA 30043	
PHONE: 770.232.0000	PHONE: 770.232.0000
CONTACT PERSON: Shane Lanham COI	NTACT PHONE: 770.232.0000
EMAIL ADDRESS: slanham@mptlawfirm.com FA	XX NUMBER: 678.518.6880
PROPERTY I	NFORMATION
PRESENT ZONING DISTRICT(S): R-100 RE	QUESTED ZONING DISTRICT RM-6
PROPOSED DEVELOPMENT: Single-family residential	subdivision
TAX PARCELNUMBER(S): 7237 0081	
ADDRESS OFPROPERTY: 641 Eva Kennedy Rd	
TOTAL ACREAGE: +/- 18.142 PUBLIC ROADWAY	Y ACCESS: Eva Kennedy Road
FOR RESIDENTIAL DEVELOPMENT:	FOR NON-RESIDENTIAL DEVELOPMENT:
NO. OF LOTS/DWELLING UNITS: 93	NO. OF BUILDINGS/UNITS: N/A
DWELLING UNIT SIZE (SQ. FT.): 1,800+ square feet	TOTAL GROSS SQUARE FEET: N/A
CEPTIFI	CATIONS
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	Gerald Tantos mille 4-17
Signature of Applicant* Date	Signature of Owner* Gexald Tanta A St. 1884
Print Name* Date	Print Name* No. 13 4 7
Signature of Notary Date	Signature of Notary
* If Additional Applicant or Owner Information is Needed Please Co	
	NEE USE ONLY
Date Received: Case No.	R2-2018-00 Accented Rv



Matthew P. Benson Gerald Davidson, Jr.* Brian T. Easley Kelly O. Faber Christopher D. Holbrook Frances H. Kim Shane M. Lanham Austen T. Mabe Jeffrey R. Mahaffey David G. McGee Steven A. Pickens Andrew D. Stancil R. Lee Tucker, Jr. *Of Counsel

<u>LETTER OF INTENT FOR REZONING APPLICATION</u> <u>OF SPARTAN INVESTORS I, LLC</u>

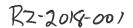
Mahaffey Pickens Tucker, LLP submits this Letter of Intent and attached rezoning application (the "Application") on behalf of Spartan Investors I, LLC (the "Applicant"), for the purpose of rezoning an approximately 18.142-acre tract (the "Property") located on the northerly side of Eva Kennedy Road between Peachtree Industrial Boulevard and Stonecypher Road. The Property is currently zoned R-100 with frontage on Eva Kennedy Road and is adjacent to land zoned C-2, C-2A, and M-1 fronting Peachtree Industrial Boulevard and Stonecypher Road.

The Applicant is proposing to develop the Property for use as a single-family attached residential subdivision including 93 rear-entry townhomes. The proposed development would also provide a substantial amount of common green space for the use and enjoyment of residents. Specifically, the Applicant is proposing to provide approximately 9.5 acres of open space/common area throughout the development which is over 50% of the Property's total area. A significant portion of this open space/common area is located on the northerly portion of the Property across an unnamed tributary to Brushy Creek.

The proposed homes would be rear-entry units accessed by internal alleyways and access drives creating an attractive streetscape both on internal streets as well as Eva Kennedy Road. Units at the front of the proposed development would face Eva Kennedy Road. Locating the proposed homes closer to the right-of-way of Eva Kennedy Road and providing additional

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sidewalk connections would further enhance the walkability of pedestrian connectivity of Old Town Suwanee and surrounding area. The proposed development would have convenient pedestrian access to nearby recreational, entertainment, civic, and commercial uses such as Suwanee Town Center, Everett's Music Barn, PlayTown Suwanee, and the Brushy Creek Greenway. The attractive building materials and architecture elements of the proposed units would also contribute to the small-town feel of the surrounding area by improving the aesthetics of the Eva Kennedy Road streetscape. Moreover, the proposed development would provide an appropriate transitional use from the more intense commercial uses and industrially-zoned property located along Peachtree Industrial Boulevard to the relatively less-intensive single-family detached residential uses along Stonecypher Road and the northerly portions of the

The Applicant and its representatives welcome the opportunity to meet with staff of the City of Suwanee Planning and Inspections Department to answer any questions or to address any concerns relating to the matters set forth in this letter or in the Rezoning Applications filed herewith. The Applicant respectfully requests your approval of these Applications.

This 30th day of November, 2017.

Historic Old Town area on Scales Road.

MAHAFFEY PICKENS TUCKER, LLP

Shane M. Lanham *Attorneys for Applicant*

REZONING APPLICANT'S RESPONSE

STANDARDS GOVERNING EXERCISE OF THE ZONING POWER

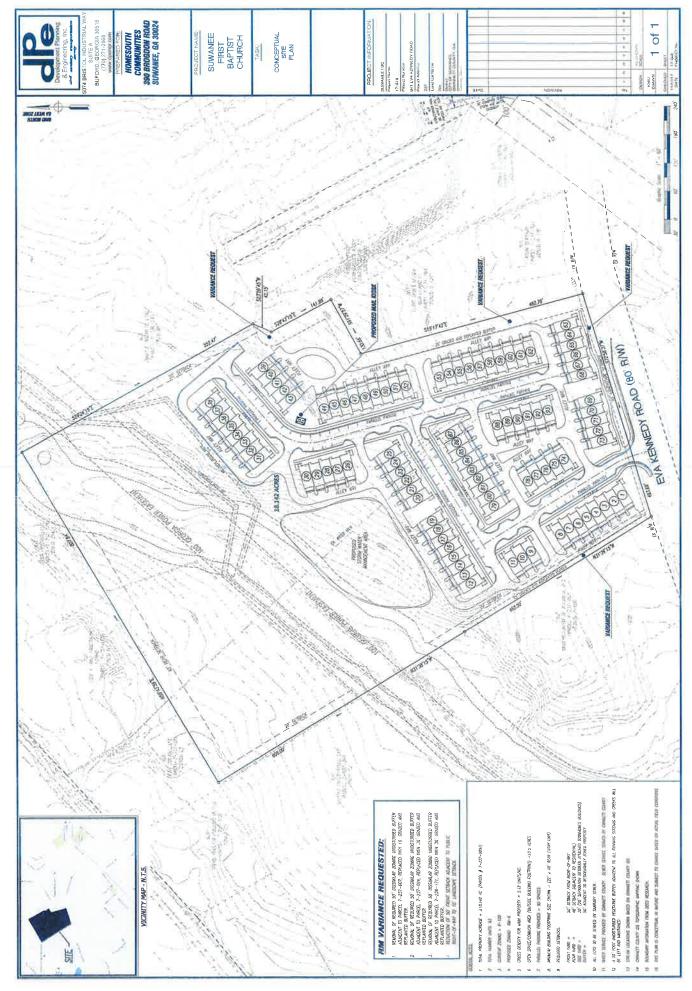
Pursuant to section 2006 of the 1998 Zoning Ordinance, the city council finds that the following standards are relevant in balancing the interest in promoting the public health, safety, morality, or general welfare against the right to the unrestricted use of property and shall govern the exercise of the zoning power.

Please respond to the following standards in the space provided or use an attachment as necessary:

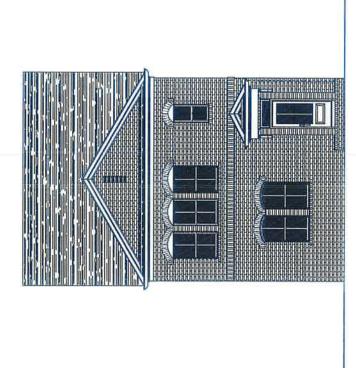
development of adjacent	posal will permit a use that is suitable in view of the use and and nearby property:
See attached	
Whether the zoning prop	posal will adversely affect the existing use or usability of adjacent or
nearby property:	
See attached	
Whether the property to	be affected by the zoning proposal has a reasonable economic use as
currently zoned:	
See attached	
	posal will result in a use which will or could cause an excessive or
burdensome use of exist	ting streets, transportation facilities, utilities or schools:
See attached	
were at at the	
	posal is in conformity with the policy and intent of the land use plan;
See attached	
Whether there are other	r existing or changing conditions affecting the use and development
	ive supporting grounds for either approval or disapproval of the zoning
proposal:	on the country of
See attached	
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REZONING APPLICANT'S RESPONSE STANDARDS GOVERNING THE EXERCISE OF THE ZONING POWER

- (A) Yes, the proposed development will permit a use that is suitable in view of the use and development of adjacent and nearby property. The property is adjacent land zoned C-2, C-2A, and M-1 located along Peachtree Industrial Boulevard and Stonecypher Road.
- (B) No, the proposed development will not adversely affect the existing use or usability of any of the nearby properties. The proposed development is complementary to existing land uses and development.
- (C) In light of the size, location, and layout of the Property and the character of surrounding uses, the Applicant submits that the property does not have reasonable economic use as currently zoned.
- (D) No, the proposed development will not result in an excessive or burdensome use of the infrastructure systems. The subject Property is located on Eva Kennedy Road in close proximity to Peachtree Industrial Boulevard, McGinnis Ferry Road, and Suwanee Dam Road with access to utilities.
- (E) Yes, the proposed development is in conformity with the policy and intent of the Suwanee 2030 Comprehensive Plan. The Property is located on the outskirts of the Historic Old Town Character Area adjacent to the PIB Corridor Character Area.
- (F) The Applicant submits that the commercial/retail and industrial zoning classifications of adjoining properties as well as the existing townhomes on Stonecypher Road provide additional support for the Application. Further, the proposed single-family attached townhome use would provide a transition of uses from commercial and retail uses along Peachtree Industrial Boulevard to less intensive single-family, detached residential uses along Stonecypher Road and in the core of the Historic Old Town Suwanee area.



REAR ENTRY BASEMENT UNITS



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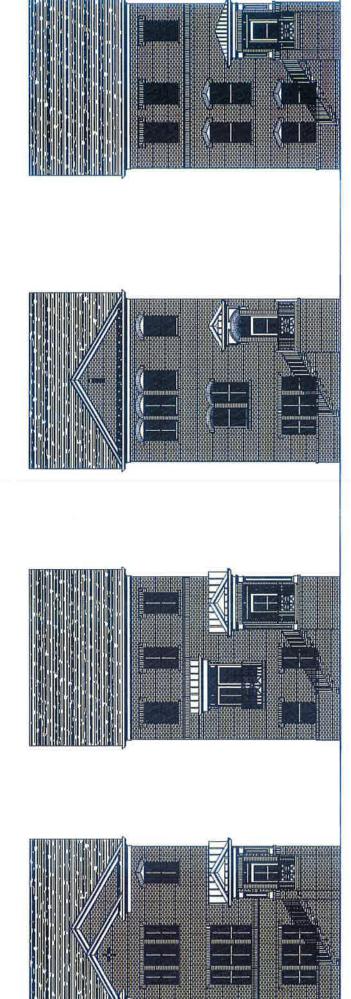


Exhibit B (244)

RZ-2018-001

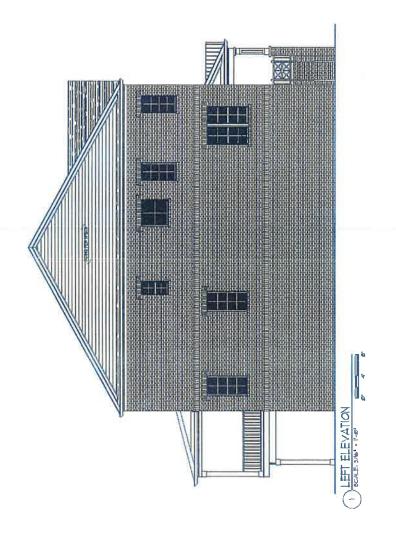


Exhibit B (30f4) R2-2018-001

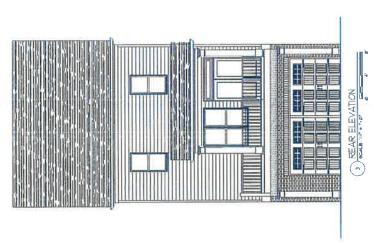
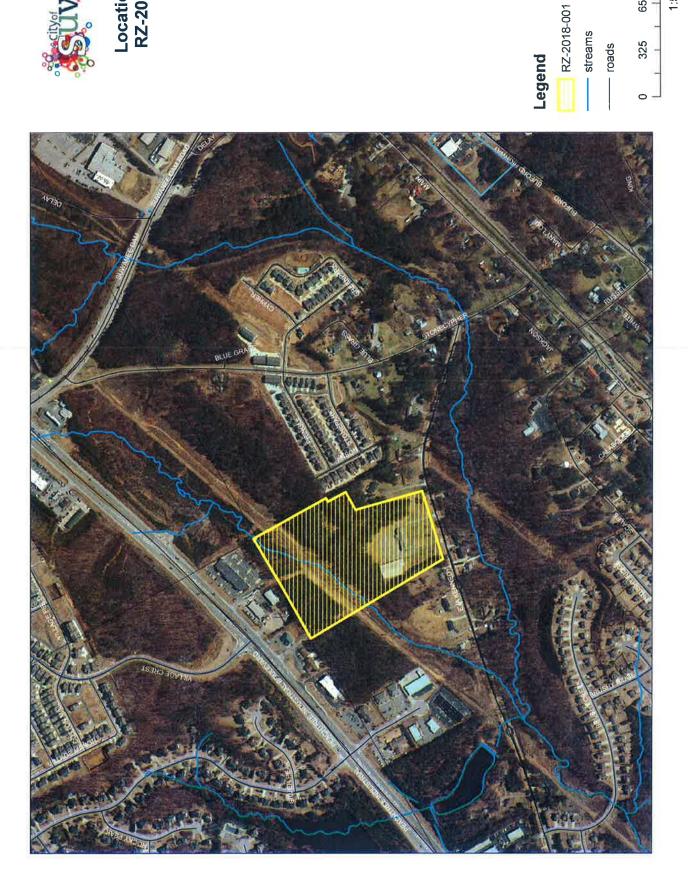


Exhibit B (4 of 4)

RZ-2018-00)



Location Map RZ-2018-001

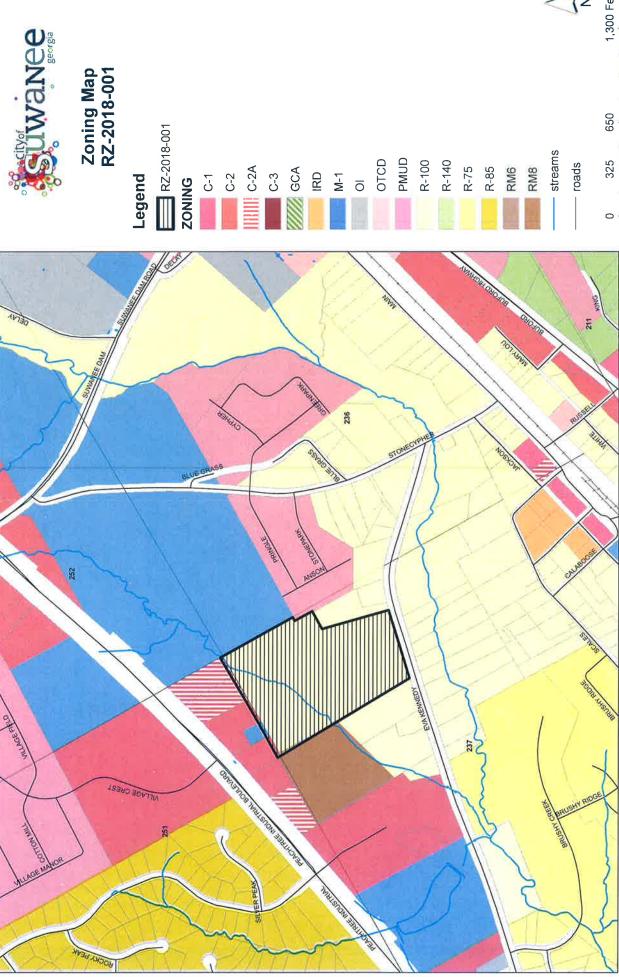


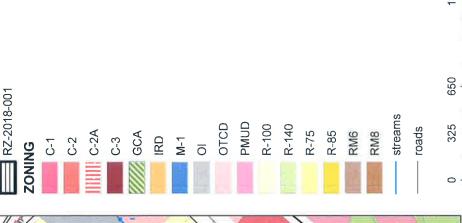
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325





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