

## Consistency Analysis

This Consistency Analysis is connected to LDCPAS-2025-17 and LDCT-2025-19 to reflect the change in requested use from CC to NAC. Contained below is an analysis of the consistency of the proposed request with provisions of the Polk County Comprehensive Plan that are germane at this stage of the development process.

### **SECTION 2.102 GROWTH MANAGEMENT.**

**OBJECTIVE 2.102-A: Development within unincorporated Polk County shall occur in accordance with the policies stated within this Future Land Use Element and all other Goals, Objectives and Policies incorporated within the Polk County Comprehensive Plan.**

POLICY 2.102-A1: DEVELOPMENT LOCATION - Polk County shall promote contiguous and compact growth patterns through the development process to minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where tracts of land are by-passed in favor of development more distant from services and existing communities.

**ANALYSIS:** *The proposed request will promote contiguous and compact growth patterns by introducing a NAC district in an area that is predominantly single-use residential development. In addition, the proposed site will act to provide services to communities along Braddock Road.*

POLICY 2.102-A11: URBAN SPRAWL CRITERIA - In accordance with Rule 9J-5.006(5) of the Florida Administrative Code, Polk County will discourage the proliferation of urban sprawl by use of the following criteria when determining the appropriateness of establishing or expanding any land use or development area. The analysis must ask whether or not the proposed plan amendment . . .

**ANALYSIS:** *See Demonstration of Need and Justification for analysis on how the proposed request will discourage the proliferation of urban sprawl.*

### **SECTION 2.105 URBAN-GROWTH AREAS (UGA).**

**OBJECTIVE 2.105-A: The Polk County Plan shall provide areas for the future development of urban-intensity growth through:**

- a.the designation and mapping of Urban Growth Areas, and**
- b.the establishment of policies to govern the development of land within the Urban-Growth Areas.**

POLICY 2.105-A1: DESCRIPTION - Urban-Growth Areas shall:

. . .

- e. include development criteria that:

1. promote the development of walkable communities which include a balance between employment opportunities, mix of complementary uses and activities, and a range of housing opportunities;
2. improve access to employment areas, schools, shopping and recreational opportunities;

**ANALYSIS:** *A NAC district on the proposed site will ultimately introduce new employment and shopping opportunities to the area. The existing and planned single-use residential development along Berkely Road will increase demand for such services in the area. In the past couple of years, the City of Auburndale, FDOT, and Polk County worked together to cause the jurisdictional transfer of Berkley Road to the state road system. This change significantly changes the type and amount of traffic on Berkely Road, which has effectively turned it into a truck route to I-4 from U.S. 92, further justifies the growing demand for commercial services. In addition, the proposed site's proximity to residential developments will promote walkability in the area.*

**POLICY 2.105-A3: LAND USE CATEGORIES** - The following land use categories shall be permitted within UGAs:

- a. **ACTIVITY CENTERS:** Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, and Employment Centers, High-Impact Commercial Centers shall be permitted within UGAs in accordance with applicable criteria.

**ANALYSIS:** *NAC districts are permitted in the Urban Growth Area (UGA).*

**OBJECTIVE 2.110-D: NEIGHBORHOOD ACTIVITY CENTERS** - The Polk County Plan shall provide for the local-shopping needs of residents through:

- a. the designation and mapping of Neighborhood Activity Centers on the Future Land Use Map Series; and
- b. the establishment of criteria applicable to the location and development of land within Neighborhood Activity Centers.

**POLICY 2.110-D3: LOCATION CRITERIA** - Neighborhood Activity Centers shall be located at the intersections of arterial and/or collector roads. There shall be the following traveling distances, on public roads, between the center of a Neighborhood Activity Center and the center of any other Neighborhood Activity Center, or other higher-level Activity Center, Linear Commercial Corridor, or Commercial Enclave providing for the same neighborhood-shopping needs:

- a. Two (2) miles within the TSDA and UGA.
- b. Four (4) miles within the SDA and UEA.

This required separation may be reduced if:

- a. The higher-level Activity Center, Linear Commercial Corridor or Commercial Enclave within the required distance separation is over 80% developed; or
- b. The proposed Neighborhood Activity Center market-area radius, minimum population support is over 10,000 people.

**ANALYSIS:** *The proposed site is located at the intersection of Berkley Road and Braddock Road. Both roads have functional classifications as Urban Collector roads. The nearest County designated Activity Center is a Commercial Enclave located at Denton Avenue and Berkely Road, which is more than one (1) mile away from the proposed site. It should also be noted there are other commercial designations within the area but they have unique characteristics regarding their designations, future intended use, and ownership. For instance, the nearest City of Auburndale activity center on Berkley Road is to the south and is owned by Polk County as part of the Lake Myrtle Park. Moving further south to Denton, there is a parcel designated as commercial that is owned by Polk County School Board for future use as a school. That said, the County Comprehensive plan provides for these instances. Separation requirements may be reduced when minimum population support exceeds 10,000 people within the proposed site's market-area radius. The applicant has submitted market data demonstrating that the site's market-area radius supports over 10,000 people. When reviewed together there is ample justification and need demonstrated for the establishment of this corner for NAC uses.*

**POLICY 2.110-D4: DEVELOPMENT CRITERIA** - Development within a Neighborhood Activity Center shall conform to the following criteria:

- a. Neighborhood Activity Centers shall have frontage on, or direct access to, an arterial or major collector roadway, or a frontage road or service drive which directly serves an arterial or collector roadway.
- b. Different uses within a Neighborhood Activity Center shall incorporate the use of frontage roads or shared ingress/egress facilities wherever practical.
- c. Adequate parking shall be provided to meet the demands of the uses, and interior traffic-circulation patterns shall facilitate the safe movement of vehicular, bicycle, and pedestrian traffic.
- d. Residential uses shall not be permitted in Neighborhood Activity Centers except as part of a mixed use Planned Development.
- e. Office uses shall not exceed 40 percent of the total area of the Neighborhood Activity center. Commercial uses may constitute 100 percent of the Neighborhood Activity center.
- f. The maximum floor area ratio shall not exceed 0.25 unless developed as a Planned Development.
- g. Planned Developments within the Neighborhood Activity Center may be permitted a maximum floor area ratio up to 0.70 and a maximum residential density of 5 dwelling units per acre. Intensity and density increases shall only be awarded to innovative, efficient, and compatible Planned Development proposals that are consistent with the general district characteristics and are located within the TSDA and UGA. The Land Development Code shall establish specific development standards and criteria for Planned Developments within activity centers.

**ANALYSIS:** *The proposed site abuts two (2) collector roads, Braddock Road and Berkley Road.*

POLICY 2.110-D5: ADJACENT DEVELOPMENT - Subject to the criteria and requirements of Section 2.125-C relating to Transitional Areas, development adjacent to a Neighborhood Activity Center may include the following uses: Office, Residential, Institutional, and Recreation and Open Space.

**ANALYSIS:** *The proposed site is adjacent to residential uses, which is a compatible use pursuant to Policy 2.110-D5 of the Comprehensive Plan.*

**OBJECTIVE 2.110-L: ACTIVITY-CENTER PLANS** - The Polk County Plan shall provide procedures for the preparation of Activity-Centers Plans in order to ensure that Activity Centers develop in a manner consistent with sound planning principles, and in accordance with development objectives of the County.

POLICY 2.110-L1: ACTIVITY-CENTER PLANS - An Activity-Center Plan (ACP) is a special, detailed land use plan for a specific Activity Center. An ACP shall include a land use map and accompanying objective and policies to provide special conditions, restrictions, or requirements for activities within the ACP. ACPs shall be incorporated into the Land Development Code with reference to the Comprehensive Plan.

**ANALYSIS:** *The applicant has provided an Activity Center Plan consistent with the requirements of the Polk County Comprehensive Plan. The applicant's Activity Center Plan addresses those special conditions, restrictions, and/or requirements contemplated in the Polk County Comprehensive Plan.*

POLICY 2.110-L2: INITIATED BY THE COUNTY - An Activity-Center Plan may be adopted for an Activity Center and become incorporated into the Future Land Use Element by a Comprehensive Plan Amendment for all new Activity Centers proposed. The ACP, shall at a minimum, include land use, traffic, and market studies, or other appropriate studies to support the requested ACP.

**ANALYSIS:** *N/A to this request.*

POLICY 2.110-L3: INITIATED BY A PROPERTY OWNER - Any property owner applying for a new Activity Center shall prepare and submit an ACP for consideration by the Board of County Commissioners for inclusion within the Future Land Use Element through a Comprehensive Plan Amendment. The ACP can also be used as supporting documentation for a proposed expansion or reclassification. The Board may require that such submittal of a requested ACP include land use, traffic, and market studies, or other appropriate studies to support the requested ACP as outlined in L5 below.

**ANALYSIS:** *The applicant is applying for a new Activity Center. The applicant has provided an Activity Center Plan consistent with the requirements of the Polk County Comprehensive Plan. The applicant's Activity Center Plan addresses those special conditions, restrictions, and/or requirements contemplated in the Polk County Comprehensive Plan.*

POLICY 2.110-L4: PLAN REQUIRED - A developer shall be required to prepare and submit an ACP for the following:

- a. a Development of Regional Impact (DRI) within an Activity Center;
- b. a request to develop a residential development with a "Special Residential" classification (15 DU/AC or more) within an Activity Center; or
- c. any new Activity Center proposed.

**ANALYSIS:** *This is an applicant initiated request for a Small Scale Comprehensive Plan amendment for future land use change to allow neighborhood activity center uses on the Subject Property. As such, the applicant has submitted an Activity Center Plan.*

**POLICY 2.110-L5: PLAN REQUIREMENTS** - ACPs, at a minimum, shall include a map, or maps, and policies which establish:

- a. Land uses designations for all property within the center;
- b. development criteria;
- c. development restrictions, if appropriate;
- d. a traffic circulation plan for the activity center; and
- e. special transportation restrictions, if appropriate.
- f. identify environmentally sensitive lands and endangered natural communities and outline proposals for the preservation and/or conservation of these areas; and
- g. any other information that the Land Development Director or his designee may request.

**ANALYSIS:** *See materials contained within this application.*