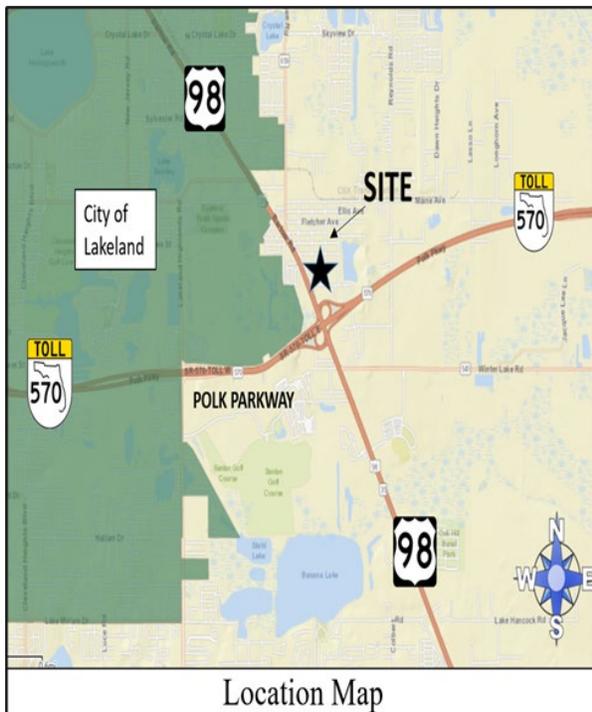


POLK COUNTY DEVELOPMENT REVIEW COMMITTEE STAFF REPORT

DRC Date:	April 27, 2025
Planning Commission Date:	June 2, 2025
BoCC Dates:	July 15, 2025
Applicant:	Sarah Case
Level of Review:	Level 4 Review, Small-Scale Comprehensive Plan Amendment
Case Number and Name:	LDCPAS-2025-7 (Brooks Street CPA)
Request:	Future Land Use change from Residential-Low X (RLX) to Business-Park Center X (BPCX).
Location:	East side of US 98, north of Brooks Street, in Section 34, Township 28, Range 24.
Property Owner:	LM & TJ Properties LLC
Parcel Size:	3.8 acres
Development Area:	Transit-Supportive Development Area (TSDA)
Future Land Use:	Residential-Low X (RLX)
Nearest Municipality:	Lakeland
DRC Recommendation:	Approval with additional recommendation
Planning Commission Vote:	Pending
Florida Commerce:	Not Applicable
Case Planner:	Mark J. Bennett, AICP, FRA-RA, CNU-A, Senior Planner



Summary:

This is an applicant-initiated Comprehensive Plan map amendment to change 3.8 acres from Residential-Low X (RLX) to Business-Park Center X (BPCX) on the Future Land Use Map. The approval justification for this request is based on the following:

- 1) The presence of industrial uses south of the site limits the viability of the site for residential use;
- 2) Implementing the special restrictions contained in Section 220 (Compatibility) of the Land Development Code will minimize the potential for adverse impacts;
- 3) The site is located in Eaton Park, a Redevelopment District, and is considered as an area in need of revitalization and/or redevelopment;
- 4) Changing the land use designation on this property could spur economic development activity, therefore implementing the policies contained in the Redevelopment Section of the Comprehensive Plan; and
- 5) The request represents a logical expansion of an existing BPC that is located at the intersection of two arterial roads.

Compatibility Summary

A concern with this request is regarding compatibility. Placing non-residential uses (such as BPCs) next to residential uses and/or lands designated as residential has the potential for adverse impacts on adjoining properties to occur. However, the relatively small size and shape of the property, combined with additional restrictions contained in Section 220 (Compatibility) in the Land Development Code, can result in a development on this site that could be considered compatible.

In addition to designating the subject property as BPC, consideration should be given to allowing adjoining properties to also transition from residential to BPC. Given that the adjacent properties are also located across Brooks Street from industrial uses and share the same characteristics as the subject property, there is merit that allows for the eventual transition for the adjoining properties also. As part of this request, staff recommends that the adjoining properties be evaluated and contemplated for a county-initiated amendment to change their property to BPC also.

Infrastructure Summary

The site is in the City of Lakeland water service area. Because this amendment is for a non-residential use, schools will not be impacted. There is sufficient roadway capacity. Public safety facilities and services are available.

Environmental Summary

The site is not within the 100-year floodplain and does not contain wetlands or surface waters. No adverse environmental impacts are expected due to the development of this site.

Comprehensive Plan

Listed below are the relevant sections of the Comprehensive Plan that are applicable to this request:

- Policy 2.102(A1-A15): Growth Management Policies
- Policy 2.104(A1-A9): Transit-Supportive Development Areas (TSDAs)
- Policy 2.113(B1-B5): Business-Park Centers (BPC)
- Policy 2.120(C1-C4): Residential-Low (RL)
- Section 2.124-F: Redevelopment Districts
- Policy 2.131-RA4: US Highway 98 Selected Area Plan (SAP)

Findings of Fact

Request and Legal Status

- LDCPAS-2025-7 is an applicant-initiated request for a Comprehensive Plan Amendment (CPA) to designate approximately \pm 3.8 acres from Residential-Low X (RLX) to Business-Park Center X (BPCX).
- Policy 2.104-A1 describes Transit Supportive Development Areas as those areas where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed use development; be supported by existing or planned urban type services that are programmed or expected for the 10-year planning horizon; be designated as part of a coordinated land use and transportation strategy that supports the provision of improved and expanded transit services, as identified in the Transportation Planning Organization (TPO) 2060 Transportation Vision Plan and the connecting circulator routes, in order to increase mobility and travel options; include development criteria that 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; and improve access to employment areas, schools, shopping and recreational opportunities
- Policy 2.109-A24 describes the Residential-Low land use district as follows: “The purpose of the Residential Low (RL) land use district is to provide areas for the low-density residential development in the urban areas of unincorporated Polk County.”
- The site is located within the US Highway 98 Selected Area Plan.
- The subject property is within the Eaton Park Redevelopment Area.
- The site is located within the Transit Centers and Corridors Overlay (TCCO), specifically a Transit Corridor within a Transit Center.
- The property is vacant and has been partially excavated for residential development.

Compatibility

- The Comprehensive Plan defines Compatibility in Section 4.400 as “A condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition.”
- The proposed request is for a Business-Park Center (BPC) use.
- Surrounding uses include a mobile home park to the west, single-family residential to the north, mobile homes to the east, and industrial uses to the south of the site, across Brooks Street.
- There are residential parcels next to the site that contain a homestead exemption (see attached exhibit).
- Policy 2.104-A3: Land Use Categories (for TSDAs) list Business-Park Centers as a permitted use.
- Policy 2.104-A7, Densities and Intensities (for the Transit Center and Corridors Overlay) states that property in a Transit Corridor within a Transit Center may have a maximum density of up to 15 units per acre.
- Policy 2.113-B-1, Characteristics of Park Centers, states that they are intended to promote employment opportunities within the region by allowing for the establishment of office parks, research and development parks, areas for light-industrial facilities, distribution centers, and mixed-use employment parks.
- BPC is on the south side of Brooks Street, across from the subject site.
- Adjoining property to the north, west, and east are designated as Residential Low X, with a Residential-Low 4X (RL-4X) sub-district designation.
- The site has been the subject of recent development proposals.
- In 2019, a Comprehensive Plan Amendment (LDCPAS-2019-11) was filed to change the Future Land Use designation for the subject property from RLX to BPCX.
- The DRC Staff Report contained a recommendation for denial, based on policy inconsistency and compatibility concerns. The applicant subsequently withdrew the application.
- In 2021, a Level 2 residential site plan was approved (LDRES-2021-113) for a residential subdivision comprising 2 single-family residences and 18 single-family attached lots.
- On November 12, 2024, a revision to the approved residential site plans was submitted to allow for an open cut for the water line in lieu of directional drill. This request is still under review.
- Section 220 of the Land Development Code, Compatibility Standards, contains development standards to ensure compatibility between residential and non-residential uses.

- The existing BPC is located next to two arterial roadways and has a full median opening on to US 98 (at the Illinois Avenue intersection).
- This site is located within Eaton Park, which is listed as a Redevelopment District in both the Future Land Use and Housing Elements of the Comprehensive Plan.
- The parcels immediately east and west of the subject parcel display some characteristics of an area in need of revitalization.
- Policy 2, 124-F1, Designation and Purpose (of Redevelopment Districts), lists seven criteria that Redevelopment Districts (and Revitalization Plans) are intended to accomplish. One of those criteria is to “promote the economic vitality of the community through the development of employment and business opportunities for community residents.”
- Adjacent properties east and west of the subject site share the same characteristics as the subject property, including the presence of industrial uses on the south side of Brooks Street.

Infrastructure

- The property is zoned for Oscar J. Pope Elementary, Crystal Lake Middle, and George Jenkins Senior High.
- Fire and ambulance response is from Polk County Polk County Fire Rescue Station 35 (Eaton Park), located at 3409 Winter Lake Road. The estimated response time from this station is about four (5) minutes.
- Sheriff’s response to the site is served by the Southwest District, located at 4120 US 98 South, Lakeland. The responses time are as follows: Priority One: 9:13 minutes; Priority Two: 24:02 minutes.
- The subject property is near US 98. US 98 is an Urban Principal Arterial, according to the Polk County TPO Roadway Network Database, and is the closet road to the site that is monitored for concurrency.
- The subject parcel is next to Brooks Street. This road is a Local Commercial Road and has a pavement width of 20 feet. In 2021, the BoCC approved a road classification change from Local Residential to Local Commercial.
- The site is located within the City of Lakeland Service Area for water service.

Environmental

- There are no wetlands or floodplains on the site.
- The site is comprised of Tavares fine sand, a moderately-well-drained soil, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey and a review of the Polk GIS Viewer.
- According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is not located within an area of documented endangered animal species sighting and eagles’ nests.

- The PolkGreen Map displays this parcel as part of a potential connection of an overall natural network. However, given that this area is developed, it is unlikely that a connection or greenway would occur. The closest conservation easement is 1.5 miles southeast of the site, as part of the Circle B. Ranch.
- This property is not within an Airport Impact District.
- The site is not within a Wellfield Protection District.
- Based on information received from the Secretary of State's Department of Historical Resources office, there are no archeological or historic resources on the site.

Comprehensive Plan Policies

- POLICY 2.102-A1 Development Location, states that 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.
- POLICY 2.102-A2 Compatibility, states that land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other Policies in this Future Land Use Element, so that one or more of the following provisions are accomplished:
 - a. there have been provisions made which buffer incompatible uses from dissimilar uses;
 - b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use;
 - c. uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.
- POLICY 2.102-A3 Distribution, states that development shall be distributed throughout the County consistently with this Future Land Use Element so that the public utility, other community services, and public transit and transportation systems can be efficiently utilized; and compact, high-density and intensity development is located where urban services can be made available.
- POLICY 2.102-A4 Timing, states that development of land shall be timed and staged in conjunction with the cost-effective and efficient provision of supporting community services which, at a minimum, shall require compliance with the Plan's Level of Service requirements and the County's concurrency management system.
- POLICY 2.102-A10 Location Criteria, states the following factors shall be taken into consideration when determining the appropriateness of establishing or expanding any land use or development area:

- a. nearness to incompatible land uses and future land uses, unless adequate buffering is provided;
- b. nearness to agriculture-production areas;
- c. distance from populated areas;
- d. economic issues, such as minimum population support and market-area radius (where applicable);
- e. adequacy of support facilities or adequacy of proposed facilities to be provided by the time of development, including, but are not limited to:
 - 1. transportation facilities, including but not limited to, mass transit, sidewalks, trails and bikeways;
 - 2. sanitary sewer and potable water service;
 - 3. storm-water management;
 - 4. solid waste collection and disposal;
 - 5. fire protection with adequate response times, properly trained personnel, and proper fire-fighting equipment;
 - 6. emergency medical service (EMS) provisions; and
 - 7. other public safety features such as law enforcement;
 - 8. schools and other educational facilities
 - 9. parks, open spaces, civic areas and other community facilities
- f. environmental factors, including, but not limited to:
 - 1. environmental sensitivity of the property and adjacent property;
 - 2. surface water features, including drainage patterns, basin characteristics, and flood hazards;
 - 3. wetlands and primary aquifer recharge areas;
 - 4. soil characteristics;
 - 5. location of potable water supplies, private wells, public well fields; and
 - 6. climatic conditions, including prevailing winds, when applicable.

- **POLICY 2.104-A1: DESCRIPTION** - Transit Supportive Development Areas shall meet the following criteria:

- a. be those areas where the availability of infrastructure and other community facilities and services, including, but not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, promotes and supports the location of higher density and intensity compact, mixed use development;

b. be supported by existing or planned urban type services that are programmed or expected for the 10-year planning horizon;

c. be designated as part of a coordinated land use and transportation strategy that supports the provision of improved and expanded transit services, as identified in the Transportation Planning Organization (TPO) 2060 Transportation Vision Plan and the connecting circulator routes, in order to increase mobility and travel options;

d. 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.

- POLICY 2.104-A3: LAND USE CATEGORIES - The following land use categories shall be permitted within TSDAs, in accordance with applicable criteria:

a. ACTIVITY CENTERS: Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, Employment Centers and High-Impact Commercial Centers.

b. RESIDENTIAL: Residential-High, Residential-Medium, and Residential-Low Districts.

c. OTHER: Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Office Centers, Leisure Recreation, Mixed Use, Institutional, Professional Institutional, Recreation and Open Space, Preservation.

Note: Some land use categories are only allowed in adopted Selected Area Plans, special areas or neighborhood plans as specified in the definitions in Section 2.109.

- POLICY 2.113-B-1: CHARACTERISTICS - Business-Park Centers are intended to promote employment opportunities within the region by allowing for the establishment of office parks, research and development parks, areas for light-industrial facilities, distribution centers, and mixed-use employment parks. Business-Park Centers are intended for land use activities that are conducted entirely within enclosed structures with the exception of loading and un-loading. These centers are not intended to accommodate major commercial or other similar high-traffic producing facilities. However, these centers often contain other minor commercial facilities, and wholesale facilities, within the Business-Park Center to support the businesses located there. General (approximate) characteristics of Business-Park Centers are:

Usable Area: 10 acres or more

Gross Leasable Area (GLA): 500,000 to 2,000,000 sq. ft.

Minimum Population Support: 150,000 or more people

Service-Area Radius: 20 miles or more

Typical Leading Tenant: One or more light-assembly plants, or warehouse facilities

Other Typical Tenants: Offices, distribution centers, research and development firms, High-Density Residential (with proper buffering).

- POLICY 2.113-B-3: LOCATION CRITERIA - Business-Park Centers shall be located with consideration being given to maximizing access to the arterial road system and with consideration given to the guidelines outlined in POLICY 2.404.-A1. In locating Business-Park Centers, Polk County shall seek to minimize the routing of commercial traffic through residential areas. Business-Park Centers shall be located on:
 - a. arterial roads;
 - b. collector roads, if the proposed district is within 2 miles of an intersecting arterial road;
 - c. local commercial roads or private roads under the following conditions:
 - 1. the road has full median access onto to an arterial road;
 - 2. the road does not serve existing or expected future residential traffic from the surrounding area; and
 - 3. the road has a structural integrity and design characteristics suitable for truck traffic.
 - d. properties abutting an Industrial (IND) district or railroad line.
- POLICY 2.113-B-4: DEVELOPMENT CRITERIA - Development within a Business-Park Center shall conform to the following criteria:
 - a. Business-Park Center developments shall have frontage on, or direct access to, a collector or better roadway, or a local commercial road or service drive that directly connects to a collector roadway or better. Business-Park Centers shall incorporate the use of frontage roads or shared ingress/egress facilities wherever practical.
 - b. 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.
 - c. Buffering shall be provided where the effects of lighting, noise, odors, and other such factors would adversely affect adjacent land uses. Parking lots, loading areas, dumpsters, utilities and air conditioning units, signage, etc. are examples of facilities which may require special buffering provisions.
 - d. Commercial activities to support activity within a Business Park Center shall not exceed 15 percent of the total area of the Business Park.
 - e. The maximum floor area ratio for commercial activities shall not exceed 0.25. The maximum floor area ratio for non-commercial activities shall not exceed 0.75 in the TSDA, 0.65 in the SDA, and 0.50 in the RDA, unless developed as a Planned Development.

f. Retail sale of goods manufactured on the site of a business located within a Business Park Center is allowed without affecting the fifteen percent (15%) of commercial activity permitted for the entire activity center provided the operation is incidental and subordinate to the manufacturing activity conducted on site and does not exceed eight percent (8%) of the total floor area or 15,000 square feet, whichever is the lesser.

g. New residential development within Business Park Centers shall be limited to High-Density Residential (with proper buffering).

h. All research and development, light-industrial, and distribution activities shall be conducted within enclosed structures with the exception of loading and unloading of transport and distribution vehicles. Outdoor storage shall be screened from off-site view and significantly limited in respect to the floor area provided within enclosed structures.

i. Where centralized water or wastewater services are not available, the maximum impervious surface ratio shall be reduced to afford better protection and function of well and septic tank septic and as required if within a Nutrient Restoration Plan Overlay.

j. Planned Developments within the Business Park Center district may be permitted a maximum floor area ratio up to 1.5 for innovative and attractive employment centers. Intensity increases shall be reserved for those uses that provide substantial economic income opportunities for the County and its residents. Intensity increases shall only be granted to parcels within the TSDA and UGA. The FAR in the RDA may be increased to 0.75 when connection to public water and sewer is available and within a half mile of a transit route. The Land Development Code shall establish development standards and criteria for Planned Developments within the BPC district.

k. Workforce housing for unaccompanied workers in barrack, dormitory, or apartment units under specific design parameters listed in the Land Development Code not to exceed an intensity of thirty-two (32) workers per acre or the limitations established by the Department of Health for water and wastewater usage, whichever allowed intensity is the lesser.

- POLICY 2.120-C1: CHARACTERISTICS - Densities up to, and including, 5.00 DU/AC. The Residential-Low classification is characterized by single-family dwelling units, duplex units, and small-scale multi-family units.
- POLICY 2.124-F1: DESIGNATION AND PURPOSE - Redevelopment Districts, and Redevelopment District Revitalization Plans, are intended to:
 - a. utilize a comprehensive, strategic approach to identify the special needs of unincorporated communities comprised of predominantly low and moderate income residents;
 - b. involve neighborhood residents in every phase of the planning process;
 - c. develop action plans to meet the identified needs including, but not limited to, social and community services, infrastructure, transportation, economic development, law enforcement, and affordable housing;

d. promote an enhanced living environment for the community, and a higher quality of life for community residents;

e. promote the economic vitality of the community through the development of employment and business opportunities for community residents;

f. encourage multi-modal transportation options, particularly pedestrian and bicycle travel; and

g. encourage community cohesion by promoting opportunities for the interaction of community residents, thereby engendering community pride, empowerment of residents, identification with, ownership of and participation in revitalization efforts, and a "sense of place."

- POLICY 2.124-F2: DESIGNATION AND MAPPING - The Future Land Use Map Series shall designate and map as "Redevelopment District" overlay those areas with a revitalization plan as approved or accepted by the Board. These areas are identified as being low to moderate income as defined by the United States Department of Housing and Urban Development income standards and the County. The non-prioritized "Redevelopment District" overlays include but are not limited to the following:

Adams Grove

Babson Park/Highland Park

Bradley Junction

Crystal Lake

Davenport

Eaton Park (emphasis added)

Echo Terrace

Eloise

Florence Villa

Fuller Heights

Fussells Corner (Carters)

Griffin Quarters

Highland City

Highland Park Manor

Inwood

Jamestown

K-Ville

Kathleen

Lakeview Park

Lakewood Park

Mammoth Grove

Maxi-Quarters

Medulla

Mullinsville

Nichols

North Florida Heights

Old Polk City Road

Loughman

Lynchburg

Rolling Hills

Wabash

Wahneta

Washington Park

Waverly

Winston

The "Redevelopment District" overlay shall be reviewed, at least annually, and amended, if necessary, to include any additional predominantly low and moderate income areas determined by the United States Department of Housing and Urban Development income standards and the County to be disproportionately in need of social and/or community services, infrastructure, transportation, economic development assistance, law enforcement, and/or affordable housing, based on an analysis of demographics, land use, crime, housing, infrastructure, and other physical and social conditions.

- POLICY 2.131-RA4: DEVELOPMENT CRITERIA FOR MODIFIED LAND USE CATEGORIES - Land within "modified land-use categories", as enumerated in Policy 2.131-RA2 shall be developed in accordance with the following criteria:

For properties within the Transit Supportive Development Area, higher densities and intensities can be achieved in accordance with the criteria established in Policy 2.104-A7.

D.BUSINESS PARK CENTERS (BPCX) - In addition to applicable provisions in the Future Land Use Element of this plan, the following provisions apply:

- 1.The BPCX shall be prohibited from having outdoor storage forward of the building's main facade, unless screened from off-site view.
- 2.Development within this land use designation shall incorporate safe pedestrian-oriented design to allow access from the surrounding parking area and adjacent parcels.
- 3.All development shall provide adequate access and amenities to support mass-transit services.
- 4.Buffering and screening standards shall be required as specified in the Land Development Code and when adjacent to property designated with a residential Future Land Use designation or adjacent to existing residential.

Development Review Committee Recommendation: Based on the information provided by the applicant, recent site visits, and the analysis conducted within this staff report, the Development Review Committee (DRC) finds that the request **IS compatible** with the surrounding land uses and general character of the area and **IS consistent** with the Polk County Comprehensive Plan and Land Development Code. Therefore, the DRC recommends **APPROVAL of LDCPAS-2025-7**. The DRC also recommends that the adjoining properties be evaluated and contemplated for a county-initiated amendment to change their property to BPC.

GENERAL NOTES

NOTE: This staff report was prepared without the benefit of testimony and evidence submitted by the public and other parties at a public hearing.

NOTE: All written comments made in the application and subsequent submissions of information made during the application review process, which are on file with the Land Development Division, shall be considered to be binding upon the applicant, provided such comments are not at variance with the Comprehensive Plan, LDC or other development regulations in effect at the time of development.

NOTE: Issuance of a development permit by the county does not in any way create any rights on the part of the applicant to obtain a permit from a state or federal agency and does not create any liability on the part of the county for issuance of the permit if the applicant fails to obtain requisite approvals or fulfill the obligations imposed by a state or federal agency or undertakes actions that result in a violation of state or federal law.

Compatibility with the Surrounding Uses

According to *Policy 2.102-A2* of Polk County's Comprehensive Plan, "land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other policies in this Future Land Use Element, so that one or more of the following provisions are accomplished: a. there have been provisions made which buffer incompatible uses from dissimilar uses; b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; and c. uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development." The "development criteria" and the "density and dimensional regulations" of a land use district are often the measuring tools used by staff to determine compatibility and the appropriateness of locating differentiating uses. Compatibility is defined in the Comprehensive Plan as "a condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition."

A. Land Uses

The site is within a Transit-Supportive Development Area (TSDA) and a Residential-Low (RL) Land Use designation. These designations recognize areas where the availability of infrastructure and other community facilities and services exist. These facilities/services include but are not limited to mass transit and other transportation alternatives, utilities, public safety, recreational and educational services, which promote and support the location of higher density and intensity compact, mixed-use development.

The site is vacant and has had recent site work, such as the placement of silt fences, a retention pond, staging of materials, and partial excavation for underground infrastructure (such as water lines and drainage facilities). Surrounding uses include a mobile home park to the west, single-family residential to the north, mobile homes to the east, and industrial uses (concrete manufacturing) to the south of the site.

The site has been the subject of recent development proposals. In 2019, a Comprehensive Plan Amendment (LDCPAS-2019-11) was filed to change the Future Land Use designation for the subject property from RLX to BPCX. In the Staff Report for this case, there was a recommendation of denial, based on policy inconsistency and compatibility concerns. The Planning Commission subsequently recommended denial of this case at their October 2, 2019, meeting. The applicant then withdrew the application prior to the hearing before the Board of County Commissioners.

In 2021 a request for a Level 2 residential site review was received (LDRES-2021-113). The request was subsequently approved on July 13, 2022, for a residential subdivision comprising 2 single-family residences and 18 single-family attached lots. Since that time site work has commenced on the project. On November 12, 2024, a revision to the approved plans was submitted to allow for an open cut across Illinois Avenue (north of the site) for the water line in lieu of directional drill. This request is still under review.

BPC Locational Criteria

As previously mentioned, the 2019 staff report for this request contained a recommendation of denial, based on a concern about this request would not be consistent with the location criteria policy for BPCs (2.113-B-3). This policy includes a requirement that BPCs be located on arterial

roads, collector roads, or local commercial roads or private roads under the following conditions: 1. the road has full median access onto to an arterial road; 2. the road does not serve existing or expected future residential traffic from the surrounding area; and 3. the road has a structural integrity and design characteristics suitable for truck traffic.

Because this request is located on Brooks Street, a local commercial road, there was a concern that the request would not comply with the requirement that a BPC on a local commercial road must have full median access onto an arterial road. However, the larger 43-acre BPC adjoining this site is located next to two arterial roads (US 98 and the Polk Parkway), and that the BPC is located at the northeast quadrant of this intersection.

The larger BPC currently has full median access to US 98 at Illinois Street. The subject site would have access to this median opening via Atlantic Avenue. Given the location of the Illinois Street/US 98 centrally located between the US 98/Polk Parkway intersection and the US/Combee Road (SR 659) intersection, it is questionable whether DOT would also allow a full-median access point at Brooks Street, only 875 + feet away from the Illinois Avenue intersection and 725 feet from the Polk Parkway intersection.

Another factor to consider is that Brooks Street once had a full-median access intersection with US 98. Based on a review of the aerial photos of this area, it appears that between 1994 and 2002, this median was closed and reconstructed into its current configuration. The result is that through no fault of their own, the applicant's property was adversely affected because of a governmental action. Typically, this is the type of criteria that is used as a justification in granting a variance. While a variance is not sought as part of this application, it can be a factor to be considered in the review of this request.

Based on the location of the existing BPC next to two arterial roadways, the presence of a full median opening for the BPC (at the US 98 and Illinois Avenue intersection), potential lack of residential interest, and the fact that this request is for the expansion of an existing BPC (as opposed to the creation of a new BPC), it is the opinion of staff that this request is consistent with the BPC location criteria contained in Policy 2.113-B-3).

Compatibility

The other main concern that was identified in the 2019 staff report for this request contained a recommendation of denial, based on a concern about compatibility. While this is still a valid concern, any subsequent site development will have to comply with several development standards that did not exist until 2021. One example of such standards is contained in Section 220 of the Land Development Code. Titled Compatibility Standards, this section establishes a 50-foot-wide zone next to residentially designated property. In this area, buildings other uses such as dumpsters, grease traps, etc. are prohibited. Special lighting requirements and additional screening and buffering of parking areas are required.

Section 220 was recently amended in February 2025 to include a new section related to Loading/Unloading Area and Accessory Truck Parking Areas. Included in these regulations are additional requirements for an 8-foot opaque fence and a building setback of 100 feet from residential property with loading and unloading bays. However, this may not be able to be implemented due to the recent passage of Florida Senate Bill 180, which places limitations on local governments from implementing more restrictive regulations after a hurricane.

These special requirements for warehouse-related uses, combined with the other compatibility standards in the LDC, will have the effect of restricting the amount of potential square footage on a lot. The subject parcel is 330 feet wide. Implementing a 50-foot Compatibility Zone on the east and west sides of the property will result in approximately 1/3 of the site having restrictions for use. The 100-foot building setback for buildings with loading/unloading bays will also limit the size and scale of any future development. Because of the restrictions on building location and site development, and due to the majority of the adjacent parcels being easier to redevelop for non-residential uses, it is the opinion of staff that this request can be made to be compatible with the adjoining properties.

Redevelopment

The 2019 staff report did not address redevelopment considerations in the review of this property or the surrounding area. This site is located within Eaton Park, which is listed as a Redevelopment District in both the Future Land Use and Housing Elements of the Comprehensive Plan. These areas are described as areas in need of revitalization and are identified as being low to moderate income as defined by the United States Department of Housing and Urban Development income standards and the County to be disproportionately in need of social and/or community services, infrastructure, transportation, economic development assistance, law enforcement, and/or affordable housing, based on an analysis of demographics, land use, crime, housing, infrastructure, and other physical and social conditions.

Properties immediately east and west of the subject parcel display some characteristics of an area in need of revitalization, with some containing a homestead classification. According to the Property Appraiser records, The Crofts Mobile Home Park, located west of the site, was established in 1965. Of the 30 single-wide mobile homes in the park, 18 units are at least 50 years old. An additional 3 units did not have any data and are presumed to be at least 50-years old also. The property immediately east of the site also contains two mobile homes, one of which is over 50 years old (built in 1972). The condition of these properties may have influenced any prospective development of this property for residential uses.

Maschmeyer Concrete, a construction materials company for concrete and block, is located south of the site. Intensive industrial uses with aggregate storage, batch plants, and truck traffic located near existing or planned residential uses raises the question of the appropriateness of the subject site for residential use. This type of industrial use may also serve as a deterrent to the development of the subject parcel for residential uses.

The nature of the adjacent residential uses, combined with the presence of industrial uses south of the site, calls into question the viability of the site for residential use. The fact that the property, which is in an existing urban area, has either been zoned and/or designated for residential use since 1970, yet has not developed as residential, is an indicator that the site is not viable for residential use. Therefore, to allow for a viable use of the property, and to further the revitalization and redevelopment of Eaton Park, the change to a BPC designation for this property should be allowed. The applicant can still develop the property for residential use based on the current Level 2 review if the requirements of that approval are met, as the approval is valid (i.e., “vested”) for 3 years.

Designating the property as BPC will further one of the policies in the Redevelopment Districts Section of the Plan. Policy 2, 124-F1, Designation and Purpose (of Redevelopment Districts), lists seven criteria that Redevelopment Districts (and Revitalization Plans) are intended to accomplish. One of those criteria is to “promote the economic vitality of the community through the

development of employment and business opportunities for community residents.” Designating the subject property as BPC will lead towards the accomplishment of this goal.

In addition to designating the subject property as BPC, consideration should be given to allowing adjoining properties to also transition from residential to BPC. Given that the adjacent properties are also located across Brooks Street from industrial uses and share the same characteristics as the subject property, there is merit that allows for the eventual transition for the adjoining properties also. As part of this request, staff recommends that the adjoining properties be evaluated and contemplated for a county-initiated amendment to change their property to BPC also. If the adjoining parcels are changed to BPC, then the provisions of Section 220 will not be as impactful to the development of the subject site for non-residential uses.

B. Infrastructure:

According to 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.”

The site is located in the Transit-Supportive Development Area (TSDA), where connections to water and sewer service are required.

The following table provides a reference point for notable and pertinent Future Land Use Map districts and existing land uses upon them.

Table 1 Future Land Use Map Districts and Existing Uses

<p>Northwest Residential-Low X (RLX) Single-family, mobile home park</p>	<p>North Residential-Low X (RLX) Single-family</p>	<p>Northeast Residential-Low X (RLX) Single-family residential, mobile homes</p>
<p>West Residential-Low X (RLX) Mobile home park</p>	<p>Subject Site Residential-Low X (RLX) Vacant (partially excavated for residential development)</p>	<p>East Residential-Low X (RLX) Mobile homes</p>
<p>Southwest Business Park Center X (BPCX) Light manufacturing, heavy industrial</p>	<p>South Business Park Center X (BPCX) Light manufacturing – aggregate storage</p>	<p>Southeast Business Park Center X (BPCX) Warehousing</p>

Nearest and Zoned Elementary, Middle, and High School

The schools zoned for the subject property are listed in Table 2 below. Because the request is for a non-residential use, the request will not impact school concurrency.

Table 2: School Information

School	Annual Estimated Demand	Distance from Subject Site
Oscar J. Pope Elementary	0	.6 mile
Crystal Lake Middle	0	1.8 miles
George Jenkins Senior High	0	3.6 miles

Source: Polk County School Board website

Nearest Sheriff, Fire, and EMS Station

Polk County Fire Rescue provides Advanced Life Support transport to all residents and visitors of Polk County. Emergency response is considered effective if response times are within eight (8) minutes in rural and suburban areas and 13 minutes in urban areas.

Sherriff response times are not as much a function of the distance to the nearest sheriff's substation rather more a function of the overall number of patrol officers within the County. Priority 1 Calls are considered true emergencies, in-progress burglary, robbery, injuries, etc. Priority 2 Calls refer to events that have already occurred, such as a burglary that occurred while the homeowner was on vacation and had just been discovered.

Table 3 provides a breakdown of response times and travel distances for emergency services.

Table 3 Public Safety Information

	Name of Station	Distance	Response Time*
Sheriff	Southwest District, located at 4120 US 98 South, Lakeland	1.4 miles	P1: 9:13 minutes P2: 24:12 minutes
Fire/ EMS	Polk County Fire Rescue Station 35 (Eaton Park), located at 3409 Winter Lake Road.	1.3 miles	5 minutes

Source: Polk County Sheriff's Office and Public Safety *Response times are based on when the station receives the call and not from when the call is made to 911.

Water and Wastewater

The subject property is in a Transit-Supportive Development Area (TSDA), where connection to public water and sewer is required. There is a 6-inch water line on the south side of Brooks Street owned by the City of Lakeland. No sewer service is available in this area.

A. Estimated Demand

The development of the property under the proposed land use designation should not negatively impact the minimum LOS for the existing facilities, due to the relatively low consumption and generation rates. Although the site has already received approval for 2 single family units and 18 townhomes, the following analysis assumes the maximum allowed density/intensity of 5 units per acre for RL, and 124,146 square feet of warehouse space for BPC.

Table 4 Estimated Water and Sewer Impact Analysis

Maximum Allowable Use: RLX - 3.8 acres * 5 DU/AC = 19 DUs BPC – 3.8 AC/165,528 SF of site *.75 FAR = 124,146 SF	Estimated Impact Analysis Residential-Low X (RLX) to Business Park Center X (BPCX) <i>Development Area: TSDA</i>	
	Current Land Use designation RLX	Maximum Permitted Use in Proposed BPC X
Current Maximum Allowable Use	19 DU	124,146 Square Feet (SF)
Potable Water Consumption	19 DUs * 250 GPD/DU = 4,750 GPD	124,146 SF * .24 GPD/SF = 29,795 GPD
Wastewater Generation	19 DU * 200 GPD/DU = 3,800 GPD	124,146 SF * .18 GPD/SF = 22,346 GPD

GPD – Gallons Per Day

Source: Polk County Concurrency Manual and Polk County Utilities: Single family 250 GPD Potable water and 200 Wastewater; Warehouse @ .24 GPD/SF (water) & .18 GPD/SF (sewer)

B. Available Capacity:

No information is available regarding the City of Lakeland’s water system capacity. This information will be required at Level 2 approval. For the Level 2 plans that are approved on the site, water service is being provided via a 6-inch line located on the north side of Illinois Avenue.

C. Planned Improvements:

No information is known currently about any planned improvements to utilities in this area.

Roadways/ Transportation Network

The Polk County Transportation Planning Organization (TPO) monitors traffic congestion on over 425 roadway segments (950 directional links). The data identifies both daily and peak hour traffic volumes. The peak hour traffic volumes are used to estimate the level-of-service for each roadway, in each direction. Level-of-service refers to the quality of traffic flow. It is the primary measure of traffic congestion. Level-of-service (LOS) is measured on a scale of ‘A’ to ‘F’ with LOS ‘A’ being the best (free-flow traffic) and LOS ‘F’ being the worst (severe traffic congestion).

The proposed Comprehensive Plan Amendment is not anticipated to affect surrounding roadways or transportation network. The Amendment will not change the LOS below the minimum established standards.

A. Estimated Demand

Table 5, following this paragraph, shows the Average Annual Daily Trip (AADT) rate and the PM Peak hour trip rate. The analysis is based on a maximum permitted use of 124,146 square feet of warehousing. Although the site has already received approval for 2 single family units and 18 townhomes, the following analysis assumes the maximum allowed density/intensity of 5 units per acre for RL, and 124,146 square feet of warehouse space for BPC.

Table 5 Estimated Transportation Impact Analysis

Maximum Allowable Use: RLx - 3.8 acres * 5 = 19 DUs BPCX – 3.8 AC/165,528 SF of site *.75 FAR = 124,146 SF	Estimated Impact Analysis Residential-Low X (RLX) to Business Park Center X (BPC X) <i>Development Area: TSDA</i>	
	Current Land Use designation RLX	Maximum Permitted Use in Proposed BPCX
	19 DU	124,146 Square Feet (SF)
Average Annual Daily Trips (AADT)	19 DU * 7.81 trips/DU = 148 AADT	124,146 SF * 1.71 trips/1,000 SF = 212 AADT
PM Peak Hour Trips	19 DU * 1 trip/DU = 19 PM Peak Hour Trips	124,146 SF * .18 trips/1,000 SF = 22 PM Peak Hour Trips

Source: Concurrency Manual and Table for Minor Traffic Study – Single family @ one house per five acres – 7.81 AADT per unit and 1 PM Peak Hour per unit 100% new trips; Warehousing (ITE 150) – 1.71 AADT/1,000 SF, .22 peak-hour trips/1,000 SF

B. Available Capacity:

The roads surrounding the subject site should have sufficient capacity available, depending on the eventual use and full build out of the site. The Polk Transportation Planning Organization (TPO) monitors certain roadways based on maximum approved traffic in comparison to current vehicle trips to determine what capacity is available.

Table 6, below, charts the generalized available capacity of the most-affected links.

Table 6 Available Capacity

Link #	Road Name	Current Level of Service (LOS)	Available PM Peak Hour Capacity	Minimum LOS Standard	5-Year Peak Hour Projected LOS
5418N	US 98 From: SR 570 (Polk Parkway) To: Edgewood Drive East	D	757	D	D
5418S	US 98 From: SR 570 (Polk Parkway) To: Edgewood Drive East	D	685	D	D

Source: Polk County Transportation Planning Organization, Concurrency Roadway Network Database January 17, 2025

As identified above, US 98 has sufficient PM peak hour capacity to support future development activity.

The subject parcel is next to Brooks Street. This road is a Local Commercial Road and has a pavement width of 20 feet.

C. Roadway Conditions

The Pavement Condition Index (PCI) along the subject property's Brooks Street frontage is "good." The portion of Brooks Street from US 98 eastward to Archer Street is rated as "fair."

D. Planned Improvements:

There are no known improvements for this portion of US 98 or Brooks Street at this time.

E. Mass Transit

The Silver Express Line (22XL) traverses US 98 from downtown Lakeland to the County Courthouse in Bartow. There is a bus stop at the northeast corner of the US 98 and Illinois Road intersection, about .3 miles walking distance from the site.

F. Sidewalks

There are no sidewalks in front of the subject property, nor along adjacent streets.

Park Facilities and Environmental Lands:

The closest park is Eaton Park, located ½ mile northwest of the site. Because the proposed amendment is for non-residential uses, it will not have an impact on this facility.

A. Location:

Eaton Park is located at 9230 Park Street, Eaton Park, 33840.

B. Services:

Eaton Park is a community park featuring a playground and a basketball court.

C. Multi-use Trails:

There are no multi-use trails in the immediate area. According to the Polk GIS Viewer, the closest trails can be found at the Circle B Ranch, 1.5 miles southeast of the site.

Environmental Lands:

The site is located within a Potential Network Connection for Natural Areas and Parks. The closest conservation easement is 1.5 miles southeast of the site, as part of the Circle B Ranch.

Environmental Conditions

There are no wetlands or floodplains on this site.

A. Surface Water:

There are no surface waters on the site. Lake Littleton is about 750 feet east of the site.

B. Wetlands/Floodplains:

The site does not contain any wetlands or floodplains.

C. Soils:

The site is comprised of Tavares fine sand, a moderately well-drained soil, according to the U.S. Department of Agriculture, Soil Conservation Service, Polk County Survey. Table 7, below, lists the soils associated with the subject site.

Table 7 Soils

Soil Name	Septic Tank Absorption Field Limitations	Limitations to Dwellings Without Basements	% of Site (approximate)
Tavares fine sand	Moderate: wetness	Slight	100%

Source: Soil Survey of Polk County, Florida, USDA, Soil Conservation Service

Any future development of the site will be subject to Section 2.303: “Soils” of the County’s Comprehensive Plan (in conjunction with the Land Development Code) which requires all development to implement Best Management Practices based on the Department of Environmental Protection’s (DEP) Florida Development Manual.

D. Protected Species

According to the Florida Natural Areas Inventory Biodiversity Matrix, the site is located within one mile of an eagle’s nest. Prior to site clearing or grubbing, the applicant shall hire a qualified professional to conduct a site survey/walkover to ensure that no threatened or endangered plant or animal species exist on the site. If any are discovered, the applicant shall properly protect the specie(s) or mitigate any impacts consistent with federal, state, and local law.

The PolkGreen Map displays this parcel as part of a potential connection of an overall natural network. However, given that this area and surrounding properties are developed, a full connection is not feasible. Moreover, there are no conservation easements on this parcel or within at least one mile of the site.

E. Archeological Resources:

Based on information received from the Secretary of State’s Department of Historical Resources office, there are no archeological or historic resources on the site.

F. Wells (Public/Private)

The site is not within a Wellfield Protection District.

G. Airports:

This property is not within an Airport Impact District.

Economic Factors:

Construction of buildings and site development activities create temporary jobs. Any new business activity that occurs at this site will need more goods and services, thereby generating more economic activity.

The proximity of this site next to US 98 & Polk Parkway interchange provides an opportunity for new businesses to locate on this property, thereby also providing jobs to support the Eaton Park community.

Consistency with the Comprehensive Plan

Many policies within the Comprehensive Plan are reviewed for consistency with an application. The most relevant policies for the proposed request are included in this section. The policy is first stated and then an analysis of how the request is provided to state that it may or may not be consistent with the Comprehensive Plan. How the request is **consistent** with the Comprehensive Plan is listed below:

Table 8 Comprehensive Plan

Comprehensive Plan Policy	Consistency Analysis
<p>POLICY 2.102-A2: COMPATIBILITY - Land shall be developed so that adjacent uses are compatible with each other, pursuant to the requirements of other Policies in this Future Land Use Element, so that one or more of the following provisions are accomplished: a. there have been provisions made which buffer incompatible uses from dissimilar uses; b. incompatible uses are made to be more compatible to each other through limiting the intensity and scale of the more intense use; c. uses are transitioned through a gradual scaling of different land use activities through the use of innovative development techniques such as a Planned Unit Development.</p>	<p>Designating this site as BPC will ensure more compatible development with intensive industrial use on the south side of Brooks Street.</p>
<p>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.</p>	<p>The site is in a developed area in an existing community, with services available.</p>
<p>POLICY 2.102-A10: LOCATION CRITERIA - The following factors shall be taken into consideration when determining the appropriateness of establishing or expanding any land use or development area: a. nearness to incompatible land uses and future land uses, unless adequate buffering is provided, b. nearness to agriculture-production areas; c. distance from populated areas; d. economic issues, such as minimum population support and market-area radius (where applicable); e. adequacy of support facilities or adequacy of proposed facilities to be provided by the time of development, including, but are not limited to:</p>	<p>Fire protection and EMS service is available up to 2.2 miles north of the site.</p> <p>The site does not have environmental constraints, such as wetlands, floodplains, or poor soils for development.</p> <p>The proximity of the site to the Polk Parkway and US 98 intersection makes it more appropriate for warehousing/distribution related uses.</p>

Comprehensive Plan Policy	Consistency Analysis
<p>1. transportation facilities, including but not limited to, mass transit, sidewalks, trails and bikeways;</p> <p>2. sanitary sewer and potable water service;</p> <p>3. storm-water management;</p> <p>4. solid waste collection and disposal;</p> <p>5. fire protection with adequate response times, properly trained personnel, and proper fire-fighting equipment;</p> <p>6. emergency medical service (EMS) provisions; and 7. other public safety features such as law enforcement; 8. schools and other educational facilities</p> <p>9. parks, open spaces, civic areas and other community facilities,</p> <p>f. environmental factors, including, but not limited to: 1. environmental sensitivity of the property and adjacent property;</p> <p>2. surface water features, including drainage patterns, basin characteristics, and flood hazards;</p> <p>3. wetlands and primary aquifer recharge areas;</p> <p>4. soil characteristics;</p> <p>5. location of potable water supplies, private wells, public well fields; and</p> <p>6. climatic conditions, including prevailing winds, when applicable.</p>	
<p>POLICY 2.104-A3: LAND USE CATEGORIES - The following land use categories shall be permitted within TSDAs, in accordance with applicable criteria:</p> <p>a. ACTIVITY CENTERS: Regional Activity Centers, Community Activity Centers, Neighborhood Activity Centers, Convenience Centers, Tourism Commercial Centers, Employment Centers and High-Impact Commercial Centers.</p> <p>b. RESIDENTIAL: Residential-High, Residential-Medium, and Residential-Low Districts.</p> <p>c. OTHER: Linear Commercial Corridors, Commercial Enclaves, Industrial, Business-Park Centers, Office Centers, Leisure Recreation, Mixed Use, Institutional, Professional Institutional, Recreation and Open Space, Preservation.</p> <p>Note: Some land use categories are only allowed in adopted Selected Area Plans, special areas or neighborhood plans as specified in the definitions in <u>Section 2.109</u>.</p>	<p>The site is in a TSDA.</p>
<p>POLICY 2.113-B-1: CHARACTERISTICS - Business-Park Centers are intended to promote employment opportunities within the region by allowing for the establishment of office parks, research and development parks, areas for light-industrial facilities, distribution centers, and mixed-use employment parks. Business-Park Centers are intended for land use activities that are conducted entirely within enclosed structures with the exception of loading and unloading. These centers are not intended to accommodate major commercial or other similar high-traffic producing facilities. However, these centers often contain other minor commercial facilities, and wholesale facilities, within the Business-Park Center to support the businesses located there. General (approximate) characteristics of Business-Park Centers are:</p>	<p>The estimated acreage of the current BPC at the Northeast quadrant of the US 98/Polk Parkway intersection is 43+/- acres.</p>

Comprehensive Plan Policy	Consistency Analysis
<p>Usable Area: 10 acres or more</p> <p>Gross Leasable Area (GLA): 500,000 to 2,000,000 sq. ft.</p> <p>Minimum Population Support: 150,000 or more people</p> <p>Service-Area Radius: 20 miles or more</p> <p>Typical Leading Tenant: One or more light-assembly plants, or warehouse facilities</p> <p>Other Typical Tenants: Offices, distribution centers, research and development firms, High-Density Residential (with proper buffering).</p>	
<p>POLICY 2.113-B-3: LOCATION CRITERIA - Business-Park Centers shall be located with consideration being given to maximizing access to the arterial road system and with consideration given to the guidelines outlined in POLICY 2.404.-A1. In locating Business-Park Centers, Polk County shall seek to minimize the routing of commercial traffic through residential areas. Business-Park Centers shall be located on:</p> <ol style="list-style-type: none"> a. arterial roads; b. collector roads, if the proposed district is within 2 miles of an intersecting arterial road; c. local commercial roads or private roads under the following conditions: <ol style="list-style-type: none"> 1. the road has full median access onto an arterial road; 2. the road does not serve existing or expected future residential traffic from the surrounding area; and 3. the road has structural integrity and design characteristics suitable for truck traffic. d. properties abutting an Industrial (IND) district or railroad line. 	<p>This request is for an expansion on an existing Business Park Center.</p> <p>The existing Business Park Center is located at the Northeast quadrant of the US 98/Polk Parkway intersection.</p> <p>The site is accessed by Brooks Street, a local commercial road.</p> <p>The existing BPC is located next to two arterial roads (US 98 and the Polk Parkway), and is also located at the northeast quadrant of the US 98 & Parkway intersection.</p>
<p>POLICY 2.124-F1: Designation and Purpose - Redevelopment Districts, and Redevelopment District Revitalization Plans, are intended to:</p> <ol style="list-style-type: none"> a. utilize a comprehensive, strategic approach to identify the special needs of unincorporated communities comprised of predominantly low and moderate income residents; b. involve neighborhood residents in every phase of the planning process; c. develop action plans to meet the identified needs including, but not limited to, social and community services, infrastructure, transportation, economic development, law enforcement, and affordable housing; d. promote an enhanced living environment for the community, and a higher quality of life for community residents; e. promote the economic vitality of the community through the development of employment and business opportunities for community residents; f. encourage multi-model transportation options, particularly pedestrian and bicycle travel; and 	<p>Development of the site for employment and business opportunities could create additional jobs, thereby promoting economic vitality.</p>

Comprehensive Plan Policy	Consistency Analysis
<p>g. encourage community cohesion by promoting opportunities for the interaction of community residents, thereby engendering community pride, empowerment of residents, identification with, ownership of and participation in revitalization efforts, and a "sense of place."</p>	
<p>POLICY 2.124-F2: DESIGNATION AND MAPPING - The Future Land Use Map Series shall designate and map as "Redevelopment District" overlay those areas with a revitalization plan as approved or accepted by the Board. These areas are identified as being low to moderate income as defined by the United States Department of Housing and Urban Development income standards and the County. The non-prioritized "Redevelopment District" overlays include but are not limited to the following:</p> <p>Adams Grove Babson Park/Highland Park Bradley Junction Crystal Lake Davenport Eaton Park</p>	<p>The subject parcel is in Eaton Park, which is listed in the Redevelopment Designation and Mapping policy (Policy 2.124-F2).</p>
<p>POLICY 2.131-RA4: DEVELOPMENT CRITERIA FOR MODIFIED LAND USE CATEGORIES - Land within "modified land-use categories", as enumerated in Policy 2.131- RA2 shall be developed in accordance with the following criteria:</p> <p>For properties within the Transit Supportive Development Area, higher densities and intensities can be achieved in accordance with the criteria established in Policy 2.104-A7.</p> <p>D.BUSINESS PARK CENTERS (BPCX) - In addition to applicable provisions in the Future Land Use Element of this plan, the following provisions apply:</p> <ol style="list-style-type: none"> 1.The BPCX shall be prohibited from having outdoor storage forward of the building's main facade, unless screened from off-site view. 2.Development within this land use designation shall incorporate safe pedestrian-oriented design to allow access from the surrounding parking area and adjacent parcels. 3.All development shall provide adequate access and amenities to support mass-transit services. 4.Buffering and screening standards shall be required as specified in the Land Development Code and when adjacent to property designated with a residential Future Land Use designation or adjacent to existing residential. 	<p>Compliance with this policy will need to be demonstrated by the applicant at time of site plan/Level 2 review.</p>

Urban Sprawl Analysis

After analyzing the primary indicators of Urban Sprawl per *Policy 2.109-A10* of the Polk County Comprehensive Plan, the proposed request is not considered to be urban sprawl.

Table 9 (below) depicts the Urban Sprawl Criteria used by staff as indicators of Urban Sprawl.

Table 9 Urban Sprawl Criteria

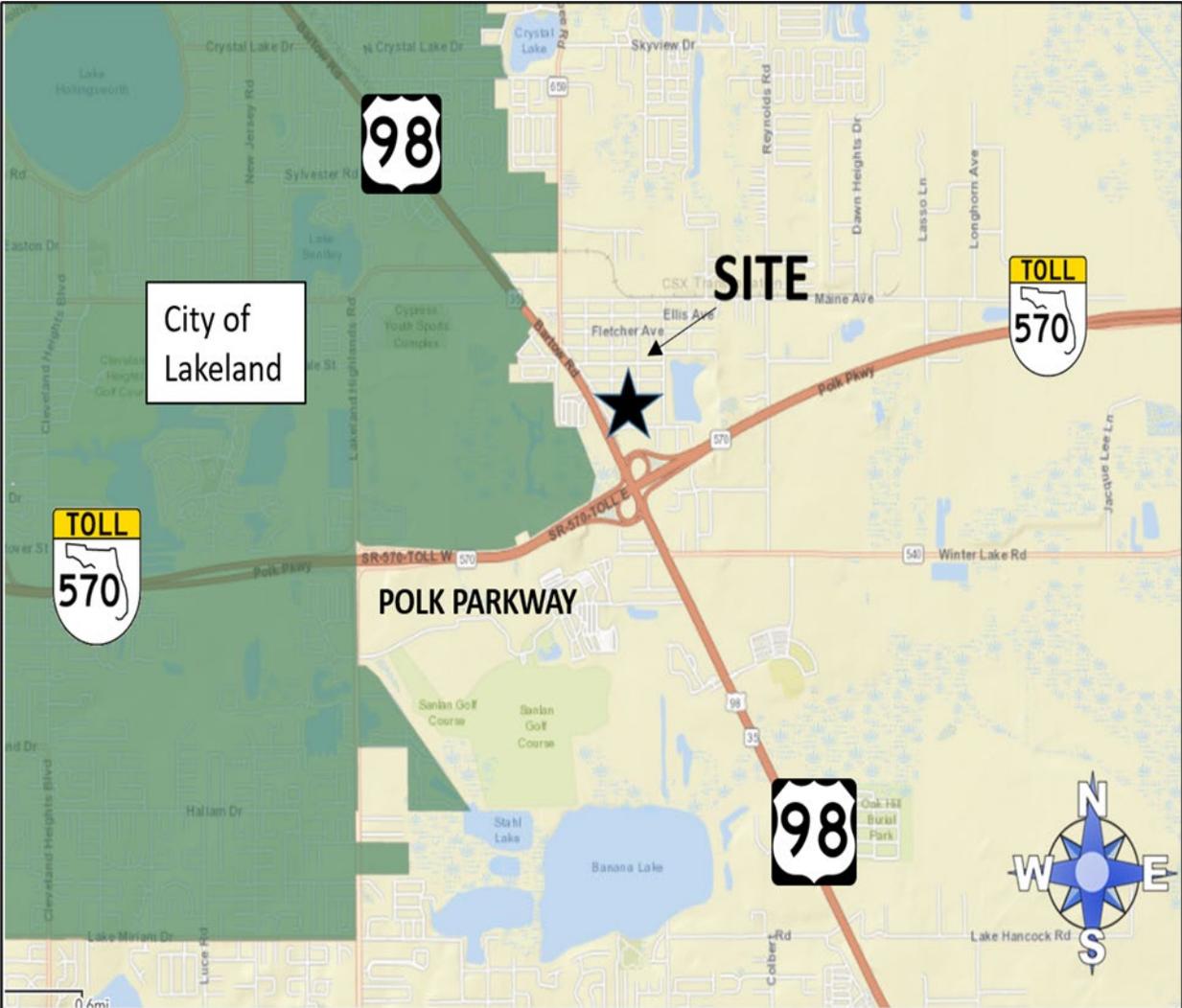
Urban Sprawl Criteria: The following criteria are the primary indicators of urban sprawl per Florida Statutes	
Urban Sprawl Criteria	Sections where referenced in this report
a. <i>Promotes substantial amounts of low-density, low-intensity, or single use development in excess of demonstrated need.</i>	Summary of analysis
b. <i>Allows a significant amount of urban development to occur in rural areas.</i>	Summary of analysis
c. <i>Designates an urban development in radial, strip isolated, or ribbon patterns emanating from existing urban developments.</i>	Summary of analysis, surrounding Development, compatibility
d. <i>Fails to adequately protect and conserve natural resources and other significant natural systems.</i>	Summary of analysis, surrounding Development, compatibility
e. <i>Fails to adequately protect adjacent agricultural areas.</i>	Compatibility with Surrounding Land Uses
f. <i>Fails to maximize existing public facilities and services.</i>	Summary of Analysis, Infrastructure
g. <i>Fails to minimize the need for future facilities and services.</i>	Summary of Analysis, Infrastructure
h. <i>Allows development patterns that will disproportionately increase the cost of providing public facilities and services.</i>	Summary of Analysis, Infrastructure
i. <i>Fails to provide a clear separation between urban and rural uses.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
j. <i>Discourages infill development or redevelopment of existing neighborhoods.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
k. <i>Fails to encourage an attractive and functional mixture of land uses.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
l. <i>Will result in poor accessibility among linked or related land uses.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses
m. <i>Results in the loss of a significant amount of open space.</i>	Summary of Analysis, Compatibility with Surrounding Land Uses

Comments From Other Agencies:

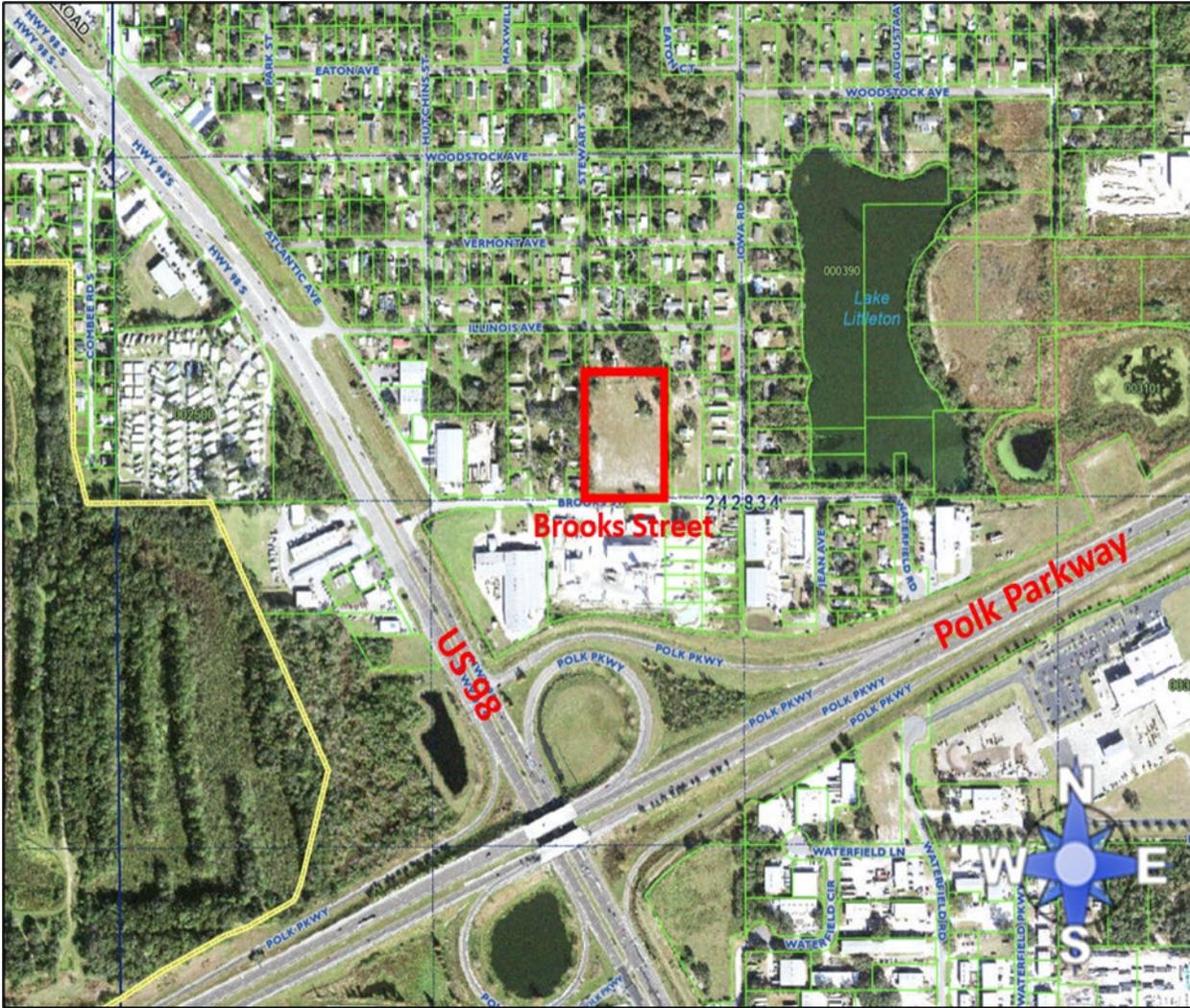
None

Exhibits:

- Exhibit – 1 Location Map
- Exhibit – 2 2023 Aerial Photo (Context)
- Exhibit – 3 2023 Aerial Photo (Detailed)
- Exhibit – 4 Current Future Land Use Map
- Exhibit – 5 Proposed Future Land Use Map
- Exhibit – 6 Homesteaded Parcels



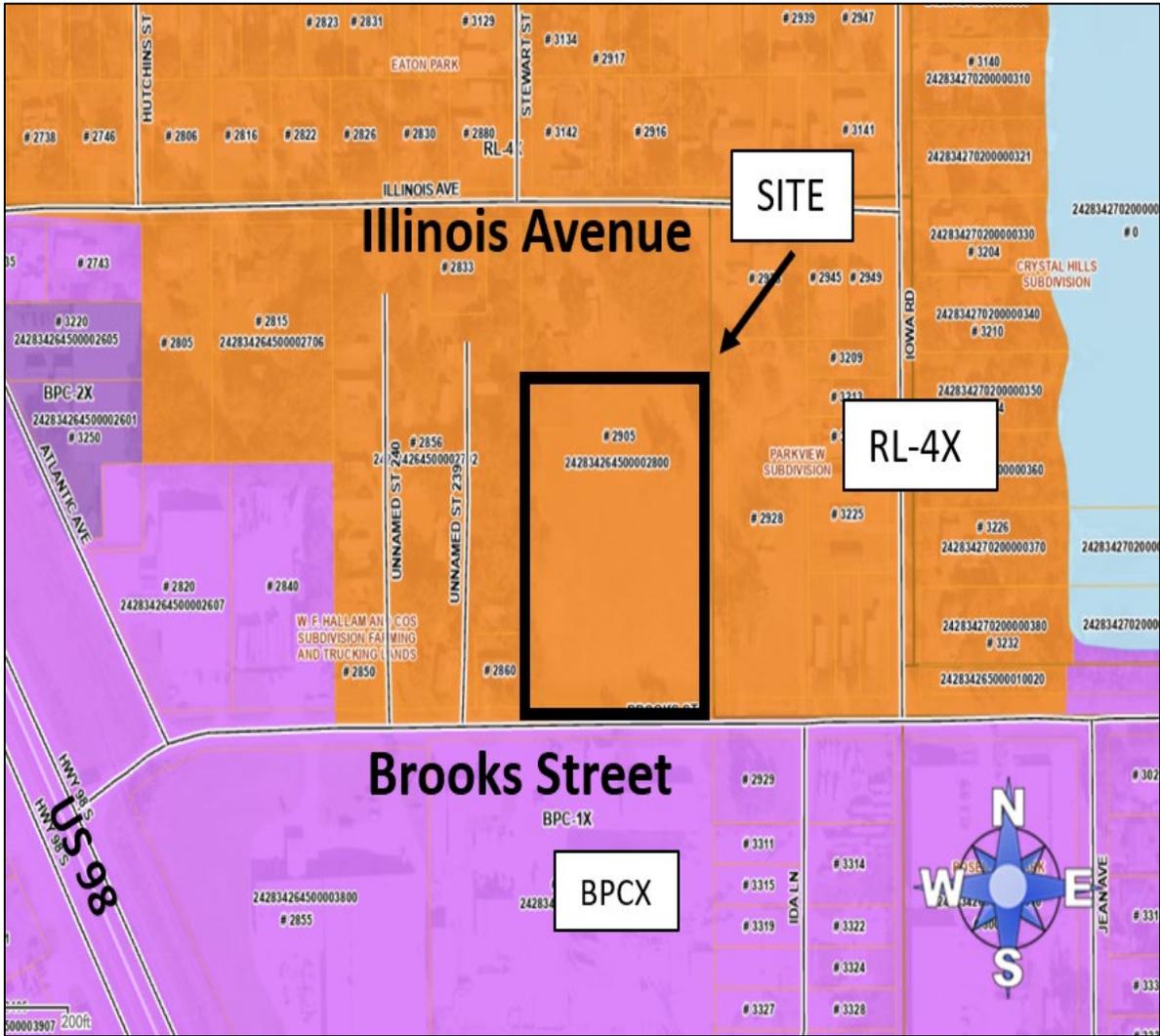
Location Map



2023 Aerial Photo (Context)



2023 Aerial Photo (Detailed)



Current Future Land Use Map



Homesteaded Parcels