



May 7, 2026

Polk County Board of County Commissioners
Land Development Division
330 West Church Street
Bartow, FL 33831-9005

Re: Smale-scale Comprehensive Plan Amendment (CPA)
Development Area Map Amendment
Demonstration of Need Narrative
LDCPAS-2026-12_2925 Pavers Road Industrial Storage Yard
2925 Pavers Road, Lakeland, FL 33803 (Parcel ID: 24-28-35-000000-012030)

To Whom it May Concern,

Madrid Engineering Group, Inc., dba Madrid CPWG/Madrid CFTL, is pleased to present this narrative in support of the proposed small-scale Polk County comprehensive plan amendment (CPA). The Owner, Visions of Lakeland LLC, proposes changing a portion of the parcel of land located at 2925 Pavers Road, Lakeland, Florida, from the Rural Development Area (RDA) to Urban Growth Area (UGA). The subject parcel is currently within both the UGA and RDA development areas. The northern portion of the site is within the UGA and the southern portion of the site is within the RDA. The parcels to the west are within the Transit Supportive Development Area (TSDA) and UGA. Parcels to the north and (north)east are within the UGA, while the south and east contiguous parcels are within the RDA. The total parcel of land is 58.91 acres. The proposed small-scale CPA would remove 38.22 acres of RDA from the parcel and convert to UGA to unify the parcel. =

No urban developments would be affected by this project. There are no effects on adjacent land uses (specifically agriculture). The remaining area of the proposed development will be utilized as open space and landscape buffers will be provided along the frontages to beautify the parcel.

Demonstration of Need:

1. Could the proposed amendment promote substantial amounts of low-density, low intensity or single use development in excess of demonstration of need.

The proposed development will not promote substantial amounts of low-density, low intensity or single use development in excess of demonstration of need. The proposed storage yard and future warehousing is consistent with the IND land use district and recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category.

2. Will passage of the proposed amendment allow a significant amount of urban development in rural areas.

The proposed development will not produce a significant amount of urban development within rural areas. While 38.22 acres is requested to be removed from the Rural Development Area (RDA) to UGA, the surrounding UGA delineation and overall site location would promote converting the parcel to an

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overall UGA designation. The surrounding RDA areas are vacant and the current RDA delineation bisects the parcel, which does not reflect the intent of the RDA development area.

3. Does the proposed amendment create or encourage urban development in radial, strip, isolated, or ribbon patterns emanating from existing urban areas.

No, the site will unify the surrounding UGA areas which will produce a more cohesive UGA development area. The northern portion of the site is within the UGA and the southern portion of the site is within the RDA. The parcels to the west are within the Transit Supportive Development Area (TSDA) and UGA. Parcels to the north and (north)east are within the UGA, while the south and east contiguous parcels are within the RDA.

4. Does the proposed amendment fail to adequately protect adjacent agricultural areas.

Adequate buffering will be provided for the adjacent agricultural land use designation, which is currently vacant. 100-foot buffers will be provided on the south and east sides due to the adjacent A/RR land use designation per the recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category.

5. Could the proposed amendment fail to maximize existing public facilities and services.

The site is within a rural area with minimal existing public facilities. The site will promote economic growth but the storage yard and warehousing nature of the proposed facility and surrounding industrial uses would most likely not influence existing public facilities.

6. Could the proposed amendment fail to minimize the need for future public facilities and services.

No, the site is within a rural area with minimal existing public facilities. Additional public facilities and services would not be warranted based on the potential increase in population or employment. The project will upgrade the adjacent Pavers Road and promote economic growth in the area.

7. Will the proposed amendment allow development patterns that will disproportionately increase the cost of providing public facilities and services.

No, the proposed development will not increase the cost of public facilities and services.

8. Does the proposed amendment fail to provide clear separation between urban and rural areas.

Adequate buffering will be provided for the adjacent agricultural land use designation, which is currently vacant. 100-foot buffers will be provided on the south and east sides due to the adjacent A/RR land use designation per the recently adopted (April 21, 2026) County Ordinance No. 2026-023 regarding the added Storage Yard land use category.

9. Will the proposed amendment discourage infill development or redevelopment of existing neighborhoods.

No, the proposed development is adjacent to vacant lands, industrial use to the east and Polk Parkway right-of-way.



10. Does the proposed amendment fail to encourage an attractive and functional mixture of land.
No, the proposed development promotes attractive and functional land use. A mixture of landscaping, dry and wet detention area will be provided to promote a scenic atmosphere entering the site or while viewing from the site from the passing Parkway.
11. Could the proposed amendment result in poor accessibility among linked or related land uses.
No, the proposed development will upgrade a portion of Pavers Road which will enhance existing accessibility. The proposed development is at the dead-end of Pavers Road, a private roadway, where access exists to the adjacent industrial use to the east via Ridgeway Lane. As part of the purchase agreement, the potential owner of the subject parcel will purchase the surrounding private roadway system including Sandyway Lane, Security Lane, Ridgeway Lane and Pavers Road from Maine Avenue to the site. Access to the surrounding industrial developments will continue as currently exist.
12. As a result of approval of this amendment, how much open space will be lost.
The total parcel of land is 58.91 acres. The proposed small-scale CPA would remove 38.22 acres of RDA from the parcel and convert to UGA to unify the parcel. Removing the RDA from the parcel and allowing the IND land use district designation to govern open space, would increase the total allowable impervious from 50% to 75%, allowing up to an additional 14.73 acres of impervious area. However, based the final wetland delineation, the potential owner may preserve the southern portion of the site by converting it to a conservation easement. A designated floodplain compensation area will act as a natural preservation area along the north and the remaining wet and dry retention areas will provide add adequate open space to meet the IND code requirements and provide ecological value to the site.

Comprehensive Plan– 2.102-A11 Urban Sprawl Criteria

The information and guidelines outlined in the urban sprawl section of the comprehensive plan do not apply as the site development does not introduce a significant population change.