

The Honorable Kenya Gibson  
Richmond City Council  
[kenya.gibson@rva.gov](mailto:kenya.gibson@rva.gov)

Richmond Planning Department  
Shaianna Trump  
Planner Associate  
[shaianna.trump2@rva.gov](mailto:shaianna.trump2@rva.gov)

To All Concerned:

Attached please find an updated petition of objection to Veritas's proposed amendment to the Community Unit Plan at 1402 Westwood. This petition currently has thirty two (32) signatures opposing the amendment, including signatures from each homeowner of a detached single family home in the Community Plan, each adjacent homeowner, and each homeowner on the entire city block, as well as several other homeowners in the Third District. To the best of my knowledge, every person who has been presented with the petition has signed.

I intend to gather additional signatures throughout Laburnum Park, Ginter Park, Sherwood Park, Rosedale, and Bellevue. More people have asked to sign, including multiple homeowners at Ginter Place Condos, also part the Community Plan, but I have yet not had time to gather these signatures, as we have been given very little time to adequately organize opposition to this plan and amendment.

I am re-submitting this petition at this time to ensure that all of these most closely adjoining homeowners' objections are heard prior to the scheduled hearing on Tuesday, April 15, 2025. More signatures will follow.

I am embedding .jpg files of each signature page at the bottom of this email, as well as attaching a .pdf of this email with signature pages.

Thank you for your time and consideration in this matter.

Sincerely,  
Tyler Coulson

Attachment

**PETITION REGARDING VERITAS'S PROPOSED CUP AMENDMENT**

**TO the Richmond City Council, Mayor Danny Avula, and Richmond Planning Department**

Because Veritas has applied for an Amendment to a Community Unit Plan that would allow the construction of six tennis courts at 1402 Westwood Avenue;

Because Veritas has failed to provide community engagement in developing and communicating that plan as required by their application;

And because Veritas has failed to establish that their proposed amendment meets the requirements of §30-456.4 of the City Code, that:

the use of the land and the design, construction, maintenance and operation of the structures, facilities and appurtenances proposed will adequately safeguard the health, safety and welfare of the occupants of the adjoining and surrounding property;

will not unreasonably impair an adequate supply of light and air to adjacent property;

will not unreasonably increase congestion in streets;

will not unreasonably increase public danger from fire or otherwise unreasonably affect public safety;

and will not diminish or impair the established values of property in surrounding areas;

WE, the undersigned residents of the Third District of Richmond, Virginia, petition the Richmond Planning Department and Richmond City Council NOT to approve the proposed amendment in its current form or any form substantially similar to its current form.

Name	Address	Signature	Date
MARY ELNER	1013 West Lapurn Ave VA 23227	Mary Elner	3-26-25
SONYA GITTELMAN	3606 Hermitage Rd. Richmond 23227	Sonya Gittelman	3/26/25
Anshu Verma	3407 Gloucester Rd VA 23227	Anshu Verma	3/27/25

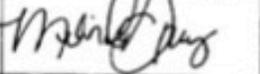
DORIS PRINCE 1402 Westwood Ave

3/9/25

PETITION REGARDING VERITAS'S PROPOSED CUP AMENDMENT

Name	Address	Signature	Date
Joyce Huffer	1410 Westwood	Joyce Huffer	3/27/25
Claudia Owens	3413 Gloucester Rd.	Claudia J. Owens	3/27/25
M'Issa Marcuson	3415 Gloucester Rd	M'Issa Marcuson	3/27/25
CHRIS BANKS	1411 BROOKLAND PkwY	Chris Banks	3/27/25
Janelle Banks	1411 Brookland PkwY	Janelle Banks	3/27/2025
Tara Fitzpatrick	1500 Brookland Parkway 23227	Tara Fitzpatrick	3/27/2025
Emily Bohm	1411 Palmyra Ave Richmond 23227	Emily Bohm	3/27/2025
Kevin Bohm	1411 Palmyra Ave 23227	Kevin Bohm	3/27/2025
Carroll Janisa	1408 Palmyra 23227	Carroll Janisa	3/27/2025
Jonathan Marrett	1412 Palmyra Ave 23227	Jonathan Marrett	3/27/2025
Whitney Pillow	3404 Gloucester Rd.	Whitney Pillow	3/27/2025
KIMMIE LOCKETT	3401 Gloucester rd.	Kimmie Lockett	3/27/2025
Brandt Pearson	3411 Gloucester rd	Brandt Pearson	3/27/2025
Ronald Lopez	1409 Palmyra Ave.	Ronald Lopez	3-28-2025
JANU OUSTON	1500 Westwood Ave	Janu Ouston	3/28/2025

PETITION REGARDING VERITAS'S PROPOSED CUP AMENDMENT

Name	Address	Signature	Date
Renee Olsten	1500 Westwood	Renee Olsten	3-28-25
Ellison Oruff	1717 W. Laburnum Ave		3/28/25
Ben Marcuson	3415 Gloucester		3/28/25
Alice Baker	3312 Gloucester Rd RVA 23227	Alice J. Baker	3/28/25
Susan Borchardt	3318 Loxley Road	Susan Borchardt	4/5/25
Melinda Spivey	1213 Greycoat Ave		4/9/25

**TO the Richmond City Council, Mayor Danny Avula, and Richmond Planning Department**

Because Veritas has applied for an Amendment to a Community Unit Plan that would allow the construction of six tennis courts at 1402 Westwood Avenue;

Veritas has failed to provide community engagement in designing that plan as required by their application;

and Veritas has failed to establish that their proposed amendment meets the requirements of §30-456.4 of the City Code, that:

the use of the land and the design, construction, maintenance and operation of the structures, facilities and appurtenances proposed will adequately safeguard the health, safety and welfare of the occupants of the adjoining and surrounding property;

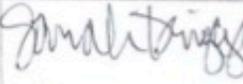
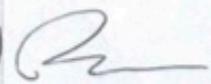
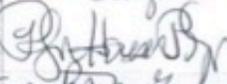
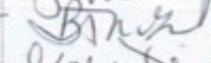
will not unreasonably impair an adequate supply of light and air to adjacent property;

will not unreasonably increase congestion in streets;

will not unreasonably increase public danger from fire or otherwise unreasonably affect public safety;

and will not diminish or impair the established values of property in surrounding areas;

WE, the undersigned residents of the Third District of Richmond, Virginia, petition the Richmond Planning Department and Richmond City Council NOT to approve the proposed amendment in its current form or any form substantially similar to its current form.

NAME	Signature	Address	Date
Sarah Driggs		1501 Palmyra Ave	4-2-25
Rob OAKLEY		1515 PALMYRA	4/2/25
Suzanne Seipel	Suzanne Seipel	1513 Palmyra	4/2/25
Rebyn Bridges		1517 Palmyra Ave	4/2/25
Butch Heiger		1506 Westwood Ave	4/2/25
Mary Dricbe	Mary Dricbe	1504 Westwood Ave	4/2/25
Jarah Masters	Jarah Masters	1503 Palmyra Ave	4/4/25

**From:** [Susan Rebillot](#)  
**To:** [Oliver, Alyson E. - PDR](#)  
**Cc:** [Gibson, Kenya J. - City Council](#); [Elliott, Sarandon C. - City Council](#); [Trump, Shaianna L. - PDR](#)  
**Subject:** Re: Veritas School Application for CUP Amendment and Land Use Tennis Court Proposal  
**Date:** Monday, March 24, 2025 12:26:21 PM

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Alyson,

Thank you very much for your reply. I did not know that the notification requirement was "at least 5 days" prior to the public hearing. Thank you. I thought that the requirement was lengthier and allowed more adequate time for abutting property owners to gather information in order to understand a zoning request, to meet with the applicant, to have their questions answered, and to respond to the Planning Commission.

Warmest regards,  
Susan

> On Mar 24, 2025, at 12:08 PM, Oliver, Alyson E. - PDR <[Alyson.Oliver@rva.gov](mailto:Alyson.Oliver@rva.gov)> wrote:

>

> Susan,

>

> Thank you for sharing your feedback. I will be sure to forward your comments to the members of the Planning Commission ahead of the meeting.

>

> I'd like to clarify the public notice requirements regarding this zoning request. In compliance with City and State law, we are obligated to send notices to abutting property owners at least 5 days prior to the scheduled Planning Commission public hearing. The notices for this particular request, which will be discussed at the Planning Commission meeting on April 1, 2025, were mailed on Friday, March 21, 2025. Upon reviewing the mailing list, I can confirm that you are listed as one of the abutting property owners. If you have not yet received the notice, I would expect that you will today or tomorrow.

>

> Should you have any additional questions or require further clarification on the noticing process, please do not hesitate to reach out to me directly. I'm happy to assist.

>

> Best,

>

> Alyson Oliver, AICP

> Planning Commission Secretary

> 804-646-3709

> [alyson.oliver@rva.gov](mailto:alyson.oliver@rva.gov)

> [rva.gov/planning-development-review](http://rva.gov/planning-development-review)

> 900 E. Broad St., Room 511, Richmond, Va. 23219-1907

>

> How am I doing? Please contact my supervisor [matthew.ebinger@rva.gov](mailto:matthew.ebinger@rva.gov)

>

>

>

>

> -----Original Message-----

> From: Susan Rebillot <[jsrebillot2@gmail.com](mailto:jsrebillot2@gmail.com)>

> Sent: Monday, March 24, 2025 10:45 AM

> To: Trump, Shaianna L. - PDR <Shaianna.Trump2@rva.gov>  
> Cc: Oliver, Alyson E. - PDR <Alyson.Oliver@rva.gov>; Gibson, Kenya J. - City Council  
<Kenya.Gibson@rva.gov>; Elliott, Sarandon C. - City Council <sarandon.elliott@rva.gov>; PDR Land Use Admin  
<dcdLandUseAdm@rva.gov>  
> Subject: Veritas School Application for CUP Amendment and Land Use Tennis Court Proposal

>  
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>  
>

> Dear Shaianna,

>  
> I am a unit owner at Ginter Place Condominiums, 1350 Westwood Avenue, Unit 303, an adjacent neighbor to the  
proposed project at 1402 Westwood Avenue. I am writing to express a complaint regarding lack of appropriate  
notice to adjacent neighbors regarding this project, including neighbors who are a party to the CUP. While a small  
blue sign appeared at 1402 on Westwood, no affected neighbors have received letters of notice nor details of the  
project or the proposed amendment to the CUP.

>  
> The lack of proper notification, lack of transparency about the project details (with a reported April 1 Planning  
Commission hearing) has provoked questions, anxiety and potential opposition to the project and to the CUP  
amendment. I am aware of neighbors' concerns at Ginter Place, in Laburnum Park, and in Sherwood Park because  
of my active role in civic associations.

>  
> This morning, I suggested to Doug Kinard, Veritas Director of Business Operations, that Veritas offer a meeting  
to provide accurate information and a conversation with neighbors who have questions and concerns. I also suggest  
that the first PDR hearing be rescheduled to allow proper notification to adjacent neighbors and time for those  
neighbors to consider information about the project.

>

> Warmest regards,

> Susan Rebillot

> Ginter Place

> 1350 Westwood Avenue

> Unit 303

> Richmond 23227

> (727) 744-3779

> Member, Ginter Park Residents Association

**From:** [Taylor Bates](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [Doug Kinard](#); [jmullen](#)  
**Subject:** Support of the Veritas Tennis Courts  
**Date:** Thursday, March 27, 2025 3:56:19 PM

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You don't often get email from [taylorjanebates@gmail.com](mailto:taylorjanebates@gmail.com). [Learn why this is important](#)

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Good afternoon Shaianna,

My name is Taylor Bates and I live at 1204 Laburnum Park Blvd. I fully support the amendment to the Community Unit Plan to reduce the number of parking spaces and allow for the construction of the tennis courts.

Veritas has been a great neighbor, and I think adding tennis courts to the neighborhood is a great idea. The courts that used to be on the adjacent property were well-used by neighbors, and these new ones will fit right in. With proper landscaping and fencing, they'll be a great addition. As a life-long tennis player I am excited about the opportunity to introduce the sport to my kids. I truly believe that having the courts in the neighborhood will be a catalyst to them becoming tennis players as well.

I also support reducing the required parking spaces to 200. Veritas has done a great job managing parking during big events - I live a block away and have no issues with events. I'd much rather see more recreational space than empty parking lots.

I appreciate Veritas's updates to our association about the new facilities and other improvements. I believe the addition of tennis courts will only continue that positive trend.

I strongly encourage you to support this amendment. Please don't hesitate to reach out if you have any questions.

Thanks,

Taylor Bates  
804-510-9905

**From:** [PDR Land Use Admin](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Letter re proposed Veritas Tennis courts  
**Date:** Friday, March 28, 2025 1:46:17 PM

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**From:** M'Lissa <levittma@gmail.com>  
**Sent:** Thursday, March 27, 2025 1:55 PM  
**To:** PDR Land Use Admin <dcdLandUseAdm@rva.gov>  
**Subject:** Letter re proposed Veritas Tennis courts

You don't often get email from [levittma@gmail.com](mailto:levittma@gmail.com). [Learn why this is important](#)

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Hello,

My name is M'Lissa Marcuson. I live at 3415 Gloucester Road in Richmond, and I am writing to oppose Veritas's proposed plan to build tennis courts at 1402 Westwood.

We live in a nearly adjoining property and were not made aware of these plans until Tuesday March 25.

We have concerns that the proposed Amendment does not address regarding an increase in traffic and parking issues, public safety, water and sanitation, drainage, as well as the effect the tennis courts would have on the value of our home, and the quiet of our neighborhood.

It is also our understanding that the proposed courts are a drastic change from existing and future residential zoning for 1402 Westwood and are deeply concerned that it will create a negative impact on our neighborhood.

Thank you.

Sincerely,

M'Lissa Marcuson  
3415 Gloucester Rd  
Richmond, VA 23227

3/25/25

Richmond City Council  
C/o The Honorable Kenya Gibson  
Councilmember, Richmond City Council  
Richmond Northside 3rd Voter District  
900 E. Broad Street, Suite 305  
Richmond, VA 23219  
Office: (804) 646-6055  
[kenya.gibson@rva.gov](mailto:kenya.gibson@rva.gov)

Mayor Danny Avula  
900 E. Broad St., Suite 201  
Richmond, VA. 23219  
Phone: 804-646-7970  
Fax: 804-646-7987  
[RVAMayor@rva.gov](mailto:RVAMayor@rva.gov)

Richmond Planning Department  
Shaianna Trump  
Planner Associate  
900 E. Broad St., Room 511  
Richmond, VA. 23219  
[Shainna.Trump2@rva.gov](mailto:Shainna.Trump2@rva.gov)

To the Richmond Planning Department, Honorable Councilmember Gibson, Honorable Members of the Richmond City Council, and Honorable Danny Avula, Mayor of Richmond,

My name is Anshu Verma, and my spouse and I own and reside at 3407 Gloucester Rd in Richmond with our two preschool aged children. I am writing to oppose Veritas's proposed plan to build tennis courts at 1402 Westwood.

Our property shares its eastern border with the parking lot that Veritas would like to turn into 6 tennis courts for its own private use. As you are aware, our property as well as the parking lot owned by Veritas are part of a CUP established by the city in 2003. When my husband and I bought this home in 2021, I was reassured by the existence of the CUP that if this parking lot were to be developed in the future, it would be for 2 story townhomes with a minimum of 15 foot green space (consisting of a mix of evergreen/deciduous trees and shrubs) between my property and said townhomes. Now, Veritas is proposing 6 tennis courts in that space instead, directly abutting our property, for their own private use.

This proposal is egregious on a number of levels. Veritas claims that the presence of these courts would "adequately safeguard the health, safety and welfare of the occupants of the adjoining and surrounding property" and "will not diminish or impair the established values of property in surrounding areas," among other claims. The proposed courts are less than 10 feet from our property line and less than 15 feet from our existing second floor ADU, with the only proposed barrier consisting of a 10 ft chain link fence

and one row of 3 ft shrubs. After extensive research, I cannot find a single tennis court in the city of Richmond in such close proximity to a single family home or dwelling in a residential neighborhood, and with good reason. Without any street, alley, or median separating our property from these tennis courts, we will be subject to significant noise and light pollution, not to mention errant tennis balls that can easily strike one of our children (who play in our yard daily) or our ADU which directly overlooks the proposed tennis courts. The construction of these courts WILL undoubtedly directly impair the safety and welfare of my family as well as affect the value of our property.

I am also concerned with the fact that the proposed amendment does nothing to address the impact of the courts on parking and traffic in our neighborhood. Veritas' existing parking for the proposed tennis courts (as well as restrooms and other facilities for players and spectators) would be on the opposite side of Ginter Place Condominiums. I and my neighbors along Westwood and Gloucester have legitimate concerns that users of the tennis course will opt to park along our streets to avoid the trek around a large seven story condo building. Neighbors in Ginter Place are also concerned about a significant increase in foot traffic across their driveway and the safety issue this entails.

Under the Richmond 300 Master plan, the lot at 1402 Westwood has a future land use designation of "residential," in line with its surrounding areas on all 4 sides. This would allow for the construction of either single family homes or 2 story townhomes, in line with the existing CUP. As we all know, the city of Richmond is struggling with an ever worsening housing affordability crisis. One of the keys to ameliorating this crisis is to allow for the development and construction of more housing within the city. In this setting, I question why the city would approve a proposal for the construction of six tennis courts for a wealthy, radically conservative private school on land that was initially slated for single family dwellings as part of the CUP AND is now planned for residential zoning under Richmond 300. To sacrifice the interests of the neighborhood residents, many of whom moved to the area due to its diversity and proximity to RPS schools, for a small private school's desire for private tennis courts does not seem to be in line with the values of this city that we have chosen to call home.

Thank you.

Sincerely,

Anshu Verma  
3407 Gloucester Rd  
336-580-4493

**From:** [Susan Rebillot](#)  
**To:** [Elliott, Sarandon C. - City Council](#); [Gibson, Kenya J. - City Council](#); [Trump, Shaianna L. - PDR](#)  
**Subject:** Fwd: Ord. 2025-046 Veritas Schools Ordinance Amendment to Community Unit Plan-Tennis Courts  
**Date:** Sunday, March 30, 2025 9:49:13 PM

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Dear Councilwoman Gibson and Ms. Trump,

I am forwarding to you my letter to the Planning Commission regarding my opposition to the proposed Ordinance 2025-046, Veritas School proposal for tennis courts and an amendment to the Community Action Plan. I want to make certain that City Planning and Land Use staff have my letter to report. Thank you.

Warmest regards,  
Susan Rebillot  
Home Owner, Ginter Place

Bcc: Stephen Weisensale, Ginter Park Residents Association, Planning and Zoning Chair

Begin forwarded message:

**From:** Susan Rebillot <[jsrebillot2@gmail.com](mailto:jsrebillot2@gmail.com)>  
**Date:** March 30, 2025 at 9:38:10 PM EDT  
**To:** [PDRLandUseAdmin@rva.gov](mailto:PDRLandUseAdmin@rva.gov)  
**Cc:** "Alyson E. Oliver PDR" <[Alyson.Oliver@rva.gov](mailto:Alyson.Oliver@rva.gov)>  
**Subject:** Ord. 2025-046 Veritas Schools Ordinance Amendment to Community Unit Plan-Tennis Courts

Sunday, March 30, 2025

Dear Planning Commission Chair and Members,

I am an abutting neighbor to the property and proposed development that is the subject of this ordinance. I am a home owner at Ginter Place, 1350 Westwood Avenue. I respectfully request a continuance of this hearing to a later date and a requirement that Veritas Schools provide a presentation to abutting and adjacent neighbors who have concerns and questions about the proposed project. While some neighbors report conversations with Veritas Schools more than a year ago, when the primary topic was their campus master plan and request for rezoning of their property east of Ginter Place, there was no presentation of the tennis court plan at that time and not since.

If the proposal goes forward in its current form, then I oppose its approval for the following reasons:

- The parcel is too small for six tennis courts and does not allow for effective buffers between the courts and both Ginter Place and the neighbors on Gloucester.
- There do not appear to be plans for landscaped buffers for both visual and sound buffers.
- While Veritas assured Ginter Place homeowners that there would be no lighting on the tennis courts, the plans show lighting. So, there must be written restrictions on the height of the lights and on the hours of the day that any court lighting may be allowed. Both the neighbors on Gloucester and Ginter Place homeowners on the west side of our building will be negatively affected by noise and lighting. This will be especially true if the school plans competitive tournaments.
- Ginter Place homeowners are particularly disadvantaged by this project plan, because the property lines of what were once parcels that were to be developed as one contiguous property were not adjusted prior to the sale of the 1402 Westwood parcel. Therefore, Veritas Schools owns the sole driveway that leads from Westwood Avenue to Ginter Place's secure parking garages, rear parking lot, and rear entrance for Emergency Medical Services. I am very concerned about potential congestion and problems when their visitors to the tennis courts use that driveway to enter Ginter Place's rear parking lot to reach parking spaces that are on Veritas' east side parcel. There is no separation at all between our deeded outdoor parking spaces and their parking spaces. While there is currently an entrance/exit on Veritas's east of Ginter Place parcel onto Palmyra Avenue that would allow Veritas users to access their parking spaces, their master plan indicates a plan to close off that entrance/exit, which would make the Westwood entrance/exit the only one that the homeowners at Ginter Place have to access our property.

I hope that you will continue any hearings on this proposed ordinance until Veritas School meets with neighbors and works out alterations to their plan to mitigate the negative impacts on neighbors.

Warmest regards,  
Susan Rebillot  
Ginter Place  
1350 Westwood Avenue  
Unit 303  
Richmond, VA 23227  
727-744-3779

**From:** [Tyler Coulson](#)  
**To:** [Mayor Danny Avula](#); [Gibson, Kenya J. - City Council](#); [Newbille, Cynthia I. - City Council](#); [Abubaker, Sarah M. - City Council](#); [Jordan, Katherine - City Council](#); [Lynch, Stephanie A. - City Council Office](#); [Robertson, Ellen F. - City Council](#); [Breton, Andrew S. - City Council](#); [Trammell, Reva M. - City Council](#); [Jones, Nicole - City Council Office](#); [Trump, Shaianna L. - PDR](#)  
**Cc:** [Sarah Driggs](#); [Susan Rebillot](#); [jgass1304@gmail.com](mailto:jgass1304@gmail.com); [dohughs@gmail.com](mailto:dohughs@gmail.com)  
**Subject:** Objection to Proposed Community Unit Plan Amendment and Zoning Changes at 1402 Westwood  
**Date:** Monday, March 31, 2025 8:56:44 AM  
**Attachments:** [Appendix C\(3\), East Private Road Sign.PNG](#)

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To Mayor Avula, Members of the Richmond City Council, and Richmond Planning Department,

My name is Tyler Coulson, and I live at 3407 Gloucester with my wife and two young children. I object to the proposed amendment to (or dissolution of) the Community Unit Plan (CUP) covering the lot at 1402 Westwood. I object for the substantive reasons that:

- 1) it would destroy the CUP protections we relied on when we purchased our home;
- 2) it would negatively impact the value and enjoyment of our home and that of our neighbors;
- 3) the plan as proposed in the application does not meet zoning requirements;
- 4) the amendment is bad for the neighborhood, and bad for the City of Richmond.

Additionally, I object because no procedure has been followed that would adequately protect the rights of adjoining property owners, much less of owners of CUP properties. This change is sought with only five days' notice to us and Veritas was responsible for community outreach, which they have not done. Additionally, I have a first hand account of Veritas representatives grossly mischaracterizing the status of the CUP at a public meeting of the Ginter Place Residents Association that preceded their application, as well as making false statements in their campaign to alter this CUP about my spouse's and my interest in the CUP, as well as false statements about our neighbor, who also owns CUP property, and their communications with him, at at least one community meeting.

## **1. Our Home Was Built Pursuant to, Is an Integral Part of, and Depends Upon the Use Restrictions in the Community Unit Plan**

Our home did not exist prior to 2008. It was a part of the property owned by the hospital, which is now the Ginter Place Condominiums. Our neighbor's house, as well, was owned by the hospital and used as a dialysis center. Both of these properties, at 3407 and 3411 Gloucester, were developed as residences under the CUP. Section 1(I)(J) of the CUP calls for the building of a detached residence, which is our home. Section 1(IV)(A) of the CUP details the minimum requirements for our home. At every point during this matter, our interests as owners of CUP property on Gloucester have been ignored.

Without the protective provisions of the CUP—namely that the lot behind our house would not be developed for non-conforming uses—it is likely that our lot would still be empty because in the context of our neighborhood no one would build on or live on our lot without the assurance that the directly abutting lot would not become a nuisance. There is no street or alley between our lot and 1402 Westwood. Veritas's amendment seeks to place a 10 foot tall chain link fence 9 feet from our property line, 16 feet from part of our home, and a tennis court roughly twenty feet from part of our home. This would be an eyesore in our backyard reminiscent of a prison camp or industrial site. These lots at 3411 and 3407 did not develop organically — they are an integral part of the CUP and their use as residence depends on its protections.

Please see the attached Appendix A to illustrate how close these lots are and how close the proposed courts would be to our accessory dwelling unit (ADU), which I currently use as an office leading calls and video conferences during the days, evenings, and on weekends, and which was designed to be converted into a residence for our parents as they age. This is only one of the many problems that the CUP was approved to protect against.

Veritas has repeatedly described this CUP as either defunct or outdated and that "only the condos were developed". This is not true. Our home is a part of this CUP; it is the first construction detailed in the CUP; we relied on CUP protections when we chose to settle in this neighborhood and we have relied on those protections daily as we continue to invest in this neighborhood and make improvements and additions to our house. To deny the purpose and restrictions of the CUP, which in part was necessary because of the idiosyncratic relationship between these two lots within the CUP, would greatly devalue our home and would make even living here possibly untenable for our family. Aside from the impact of the fence itself, imagine the constant noise nuisance of tennis (and no doubt pickleball) matches taking place in such close proximity to the backyards of our property and that of our neighbors.

## **2. The Proposed Amendment Would Impair the Value of Our Home and Neighboring Homes And Does Not Meet Zoning Standards**

Their application includes a letter to the planning department from Roth Jackson, the attorneys representing Veritas in this matter, dated July 9, 2024. I want to stress that I first saw this letter on Tuesday, March 25, 2025, one week from a scheduled planning hearing on this amendment. In this letter, a Veritas attorney recites five reasons for this amendment to be approved; each concern zoning ordinance requirements for such an amendment, yet each are made as conclusory statements without any proof offered and many, if not all, are simply wrong. If there are any data or studies to support these claims, which I doubt, then they have not been made publicly available.

I will address each claim in the order they were made in the letter.

*A. That the tennis courts and fence would "adequately safeguard the health, safety, and welfare of the occupants of the adjoining and surrounding property."*

This is not true.

First, anyone who has seen a high school or junior high tennis practice (or who has seen me attempt to play) knows that a ten foot fence won't keep tennis balls in. There will no doubt be tennis balls launched into our back yard where our two-year-old and four-year-old child play and where we spend most of our time during good weather. The fence is a mere 9 feet from our yard which, because our lot was carved out of the old hospital campus, is among the smallest lots in our neighborhood — an absurd proposal, even if there weren't a CUP or zoning regulations. Our children will not feel safe playing in our backyard, and we will not feel safe spending time in our backyard. Tennis balls will likely also strike our ADU which I currently use as a home office evenings and weekends (when there would be tennis) and which we built as the planned future home of our children's grandparents as they age.

Tennis is loud. We would be about 15 feet from a tennis court under this egregious proposal. On the other side of the lot is Ginter Place Condos, which is a towering brick wall — every time a racket strikes a ball it will echo back at us so that we will hear it twice. There is a reason why tennis courts are not located in these types of enclosed residential neighborhoods, and that is that an otherwise beautiful sport becomes an absolute nuisance when forced upon people's homes in such a way.

This is not to mention the potential nuisance of pickleball. Pickleball, which is extremely popular lately and is likely to be played there, is currently the cause of huge amounts of litigation nationwide because it is so loud. The application does not even mention a pickleball prohibition. And it's arguably only a little louder than tennis.

There appears to be an enormous amount of lighting on one of the

proposed renderings, which I saw only this week and was not included in the notice provided to any adjacent properties by the City. That much lighting, indeed any lighting sufficient for a sporting event, is inappropriate for that lot and presents potential health and safety concerns that are not addressed anywhere in the application for this amendment. Although I have been told repeatedly that Veritas "promised" the Ginter Park Condos that there would be no lighting, Richmond Permit Portal shows that they have already applied for a permit to install lighting for a tennis court project on that lot.

Tennis courts in this lot will endanger my family and will interfere with quiet enjoyment of our home, as well as that of our neighbors. It is absurd to suggest otherwise.

*B. The tennis courts and fence "will not unreasonably impair an adequate supply of light or air to the adjacent property."*

To the extent this could be true, it is true only in form and not in substance. Please see the attached Appendix A again.

A ten foot fence 9 feet away from us is inadequate to keep balls out of our yard anyway, but is regrettably tall enough to look like we live in a work camp or adjoin an industrial site. Our back yard will feel like a prison. What morning light we get, already limited by Ginter Place condos, will be dappled not with leaves but with a chain link fence and windscreen.

Additionally, this plan leaves a Dominion easement between the chain fence and our fence, which will create a practically hidden tunnel that goes deep into this residential block. It will be hidden from view from Westwood Avenue, unlit and, no matter which of these drawings is followed, empty of any substantial vegetation. That will likely become a night time corridor or attraction for people. There is already a wooded spot on this lot where people sometimes sleep, use drugs, or use as a toilet. Our neighbor who adjoins the wooded portion has repeatedly asked Veritas to better manage that wooded area yet they have apparently done nothing to remediate it. The CUP, on the other hand, calls for this area to be a green space inside a residential block, as it should be.

(I want to note that on one of the proposal drawings, Veritas has graciously noted as a selling point that there is a line of evergreen trees there marked "Evergreen trees - to remain". Those trees belong to our neighbor. According to her, she had a survey done to make sure they were on her land before she and her late husband planted them in order to stop Veritas students and families from shortcut crossing her yard despite asking them not to. Accordingly, at least one of the proposed drawings is potentially materially misleading in that it appears to claim that Veritas has control over those trees, which it likely does not.)

All of this amounts to potential if not likely unreasonable impairment of light and air quality, and yet none of this is addressed in the application. A lawyer simply wrote that it wouldn't, but that doesn't prove anything. It doesn't even offer proof.

*C. The amendment will not "unreasonably increase congestion in the streets".*

The application does not support this conclusion.

We have seen no studies indicating what traffic increases there would be in the event of recreational tennis, organized practices, organized matches, or organized tournaments. If this is approved, there will be people parking on Gloucester and other neighboring streets to attend these matches; there will be an increase in vehicle traffic during whatever practices they have there. There will absolutely be an increase in traffic, including foot traffic across the Ginter Place Condos vehicular entrance and exit, and this amendment neither shows that this has been studied or makes any provision to handle the increase in traffic or increased need for parking.

Almost every neighbor I have spoken with has voiced concerns about traffic and parking with me. Traffic is already bad during select times of the day because when Veritas students, who are apparently primarily from the counties and not from Richmond, are picked up and dropped off, the drivers often exceed posted speed limits and there is often a substantial line of cars on Palmyra which makes entering and exiting the neighborhood more challenging.

Moreover, any practices, matches, or tournaments, will necessarily cause a huge increase in foot traffic across Ginter Place's current driveway which, I understand, belongs to Veritas. Ginter Place currently uses this driveway under some sort of easement agreement, I would imagine, or else under an easement by necessity, because the CUP requires the back entrance to Ginter Place to remain chained. The vast increase of foot traffic across that driveway could very well be a public safety hazard in itself and, presumably, would lead to higher insurance costs or liability exposure to Veritas or Ginter Place Condos or both. There is no indication in this application that this has been studied or even recognized as a potential problem, much less one that could be partial grounds for complete dissolution of the CUP (which is very clearly Veritas's end plan, as it was their stated goal long before this amendment was even proposed). In turn, this would cause an enormous increase in traffic on Palmyra, which was avoided in the first place by this very provision in the CUP. Note, also, that the ongoing renovation down the block at the Hermitage will also place substantial increased traffic pressure on Palmyra.

None of this has been noted or discussed in the application. I would add

that it was not discussed in supporting documentation, but I won't bother because there is no supporting documentation at all.

I have two young children here. There are two more young children across the street and two up the block, and that is just on this city block. This is a neighborhood where people move to raise children. There are already people who drive far too fast and too frequently in this neighborhood, often when dropping off or picking up their children at Veritas. That this school would make this proposal without even suggesting that it had studied the dangers that it might pose to our children is so far beyond reasonable that it shocks the conscience.

*D. The amendment, they claim, will not "unreasonably increase public danger from fire or otherwise unreasonably affect public safety".*

We have no way of knowing if this is true or not.

I see nothing in this proposal to cover matters of after hours use of the courts, locked gates, waste management, drainage, environmental impact, or patrol. None of these public sanitation or safety issues are addressed outside of a conclusory paragraph with no data to back it up, and yet each of these issues potentially affects the public safety of the neighborhood. There is nothing in the application to address the public safety concerns surrounding children and parents crossing the Ginter Place Condos' sole entrance, none to address the safety issues around the lack of night time control, and none to address the public safety issues that might arise from a change in drainage (in a block where drainage can often be an issue). These are all potential public safety issues that immediately spring to mind, yet none are addressed.

The Dominion easement presents a host of other public safety issues, some of which I've already mentioned. If this application shows what form of use the Dominion easement will take, then I don't see it. Will it be used for buried lines? Or will Dominion erect more poles and wires? It is my understanding that Dominion cannot bury lines there without an easement somewhere for an above ground transformer, and that would have to be on someone else's property I think. Has Veritas discussed that with the community? It has not, to the best of my knowledge. If there are going to be yet more above ground wires, then we will have more power lines within 9 feet of our home, leaving our home almost completely encircled in above ground power lines. That, alone, presents both a health and safety danger for the families on Gloucester.

And the fact that the Dominion easement would create this no-man's-land tunnel between fenced residences and their 10 foot tall chain link fence and windscreen in which debris and litter would accumulate (in large amounts, if Veritas's management of the existing lot is any indication), would also increase fire danger.

I do not think the planning department or City Council should approve an amendment with all of these potential dangers not even addressed in the proposal or, indeed, without allowing the neighborhood time to understand this proposal — without even time for the adjoining lots to review and understand this proposal. And it is wholly unreasonable for this matter to be handled on a consent agenda basis.

*E. The amendment "will not diminish or impair the established values of property in surrounding area".*

This is simply not true. Please see Appendix B, which is a picture from Google Earth that illustrates how preposterous this idea is.

Our home, and the home of our neighbor at 3411 Gloucester will absolutely see a decrease in value of our properties. Please note how shallow the lots are at this end of the block. The lot at 3413, for example, is substantially deeper. This is because our lots at 3407 and 3411, which are a part of this CUP, were developed in this effort to repurpose the old hospital campus. It was necessary to make certain use restrictions in order to make these two lots viable as single family detached dwellings in this neighborhood.

Six tennis courts and a chain link fence 9 feet away from the back, with only an empty utility easement between them, surrounded on all sides by residences including a nine-story condo building, is more than eyesore. It is an offensive proposal. Please, look at Appendix B. No one in their right mind could look at that and think that any tennis courts should go there, let alone six, or that they wouldn't devalue the adjoining properties.

The towering chain link fence, alone, will make our home less attractive to live in, and lower the value. We have worked hard and continue to work on beautifying our back yard — a challenge in no small part because it was developed on top of an old parking lot. Power lines would further block our access to sunlight. And the removal of the protections that we are owed and that we relied on in the CUP will by definition devalue our property as it would, essentially, strip away a property right that touches and concerns our land. Our homes will be devalued. It is patently absurd to suggest otherwise.

And, as I mentioned earlier, there are clear reasons tennis courts are generally not built in residential lots like this. Tennis courts are generally located in parks, or big open spaces, and they are separated from residences at bare minimum by a road. I have not found one in Richmond that is either, let alone both, of 1) not in a park or adjoining open space, and 2) surrounded by residences on four sides. The courts in Battery Park, for example, are bounded by ample green space and streets. The tennis

courts at St. Christopher's School are adjacent to residences on only one side and two of the sides meet large open spaces. (And I don't know this, because I have been given only five days to review this proposal, but I would bet that the courts at St. Christophers didn't require an amendment to a Community Unit Plan precisely designed to retrofit a hospital campus into residential space.)

It is absurd to claim that this will not affect the value of our home, and it is offensive to every homeowner on Gloucester and in the surrounding area. I continue to be shocked that this proposal is on a consent agenda after five days' notice, when none of the effected lot homeowners knew any details about this proposal despite it being on file with the City.

That these claims were made without any data or any studies to support them is especially egregious in light of City Council Resolution No. 2017-R015, adopted March 27, 2017, in which the City Council resolved, regarding development of the Westwood Tract beginning across the street from Veritas to the South, that a previous traffic study had failed to adequately account for traffic at Veritas's Lamont intersection, and that any development on that tract owed to residents in the vicinity studies on "effects on historic preservation, schools, stormwater drainage, and traffic."

Veritas's applies now for non-conforming development right across the street from that tract and yet I've seen no study on the impact of historic preservation, despite the presence of what has been described to me as the "oldest slave wall in Richmond", the 8-foot brick wall which apparently would be removed for the tennis court project — although the CUP calls for its maintenance. There has been no study on the effects on schools, nor on stormwater drainage which, as I stated, is a concern in this block. As for traffic, that Resolution reads, in part: "WHEREAS, the Council believes that the traffic impact analysis entitled "Bristol and Westwood Development, Traffic Impact Analysis, Richmond, Virginia," prepared by Timmons Group, and dated June 25, 2015, did not sufficiently capture the morning traffic associated with Veritas School and did not sufficiently model the traffic or safety impacts of a proposed new access point at the intersection of Westwood Avenue and Lamont Street...."

That's the only traffic study I have heard of that is even remotely related to potential traffic issues here—and which I had to dig for in archives of Council resolutions—and the City has already resolved that at least that report failed to adequately account for Veritas traffic.

I have been discussing this matter in my neighborhood, and no one on the east side of Gloucester had even seen Veritas's plans until I showed them. I am literally carrying them from house to house to talk to people because Veritas never did. I have already submitted a petition opposing this Amendment on which are the signatures of every homeowner on the entire

city block, as well as most of the west side of 3400 block of Gloucester, the north side of Palmyra, and many from the surrounding neighborhood. I will soon circulate the petition throughout Laburnum Park, Ginter Park, Sherwood Park, Rosedale, Bellevue, and the Ginter Place Condominiums, provided I have the time. I have not yet encountered a Third District resident who either knew any details about this proposal or who supports it. And I have not yet presented the petition to a Third District resident who declined to sign the petition.

### **3. This Amendment is Bad for the Neighborhood and Bad for Richmond**

This proposed amendment is bad for the Ginter Park and Laburnum Park neighborhoods and simply does not serve the interests of the community. We enjoy access to green and public spaces in our lovely medians, Shalom Farms and the park; etc. There are tennis courts in Battery Park, Bryan Park, and Byrd Park, all within a short drive or, in Battery Park, a brisk walk. The CUP was designed with the needs of this neighborhood and the City as a whole in mind, and any amendment to it should also consider the needs of both the neighborhood and city as a whole.

I understand that Veritas has claimed, although I've not heard this directly because they've spoken to me only once, that the courts would be open to the public when not in use by Veritas. Well, that's not a good thing for the adjoining properties. More tennis is not better than less tennis when it is 10 feet from your home. It is my understanding that Veritas has made this same claim before, but I invite anyone to drive by their soccer field or playground — they are not open to the public; few non-Veritas people in our neighborhood feel welcome there.

Please see attached Appendix C. These are pictures of the corner of Palmyra and Lamont where pick up and drop off for Veritas happens and where one would likely go to access the soccer field, etc. The first is a screen shot of the Lamont street sign on Google Maps; Lamont appears as a public road on Google Maps, ArcGis.com (which I accessed through the Richmond government website), is mentioned in the O&R Transmittal of February 10, 2025, from Kevin J. Vonck, Director of Planning and Development Review, and there is a Richmond city road sign. So I believe that this street belongs to Richmond. The second picture is a close up of the street sign so that you can read "Lamont". The third is a screenshot of the private campus and "PRIVATE ROAD" sign erected by Veritas on the west side of Lamont at that intersection. The fourth is of the "PRIVATE ROAD" sign erected by Veritas on the east side of Lamont at that intersection. Both of these signs appear to have been erected on city property.

Two of my neighbors, both of whom have been in this neighborhood for decades, mentioned these signs to me and how surprised they were to see them. I have inquired with city officials to confirm that Lamont is a

Richmond city street, but have not yet received a response, again because I was given a mere 5 days to look into these issues. If Lamont is a city street, then I would also like this letter to serve as a demand that the City of Richmond remove these "Private Road" signs. This does not indicate to me that Veritas intends for anything to be open to the public.

And even if these tennis courts were open to public use, no one I have spoken with has any interest in having access to tennis courts owned by a radical private school whose values do not align with ours, with our neighbors, or with the City of Richmond. And, to repeat, it would be far worse for all adjoining properties if the courts were open to the public because more tennis in this setting would be worse.

This amendment would increase traffic, likely decrease property values of adjoining properties, further drive a wedge between our neighborhood, and would defeat the purposes of both the CUP and of the greater master plans of the City of Richmond.

Additionally, it would deny the city of future property tax revenue that could be generated as a result of residential development instead of a part-time recreational facility for an institution that, according to the one city source I could find online, has been billed and has paid zero dollars in property taxes since 2008. In other words, we actual residents of Richmond who pay our property taxes are being asked to subsidize tennis courts that we do not want for a private school whose student body isn't even exclusively from Richmond, on a lot designated for a use that would otherwise generate tax revenue to fund our own schools. We are being asked to subsidize tennis courts for a school whose accrediting standards, at least as of October 6, 2021, when the Association of Classical Christian Schools published their accreditation standards on [classicalchristian.org](https://classicalchristian.org), included the following:

"If families enroll that uphold values in juxtaposition with the school community, they will disrupt the school's ethos. In other words, students will be in conflict over acceptance of what is taught, and what is present in the community. This is particularly evident with false values around LGBT inclusion or non-Christian enrollment (Mormon, Muslim)." ACCS Accreditation Handbook, Second Edition, available at <https://classicalchristian.org/wp-content/uploads/2021/10/Accreditation-Standards-10.6.21.pdf>, page 19 (last visited March 31, 2025).

We are essentially being asked to subsidize tennis courts for a school that would likely not even allow many wonderful people in our own neighborhood to attend.

Even if the CUP and zoning were not at issue, and even if Veritas had full unfettered right to build tennis courts, it is clear that a majority of the

residents and adjoining owners are against this — the fact that Veritas is so determined to use this land for private tennis courts despite all of the harm to the adjoining neighbors shows that they are acting without any concern whatsoever for the people of this neighborhood. They have made it clear by this action, and directly to me in our one face-to-face interaction, that they do not care about anything other than Veritas.

Additionally, this amendment is a travesty for a city that is facing skyrocketing rents and a lack of single family housing. Everyone knows how hard it is to find suitable housing in Richmond — I believe that most of the current City Council and Mayor campaigned in no small part on housing issues. This lot is designated for residential use under the existing CUP and is also designated for residential use under the Richmond Master Plan. There is no reasonable justification for taking a lot designated for either a small number of luxury town homes or a limited number of single family detached homes under the master plan, and turning it instead into tennis courts for a private school whose students often, if not mostly, do not reside in Richmond.

That is a slap in the face of every Richmond resident who wants to make this city their home forever, and for every family searching for a home in Richmond.

#### **4. Veritas Has Failed To Engage in Community Outreach**

On March 25, I for the first time saw the application that was placed in June of 2024. It is beyond the pale that I and my neighbor, both of whom are part of this CUP, were not made aware of this sooner and indeed had to receive these documents through texts from people who got them from people who got them from people, etc. In the February 10 O&R Transmittal, it clearly states "COMMUNITY ENGAGEMENT: Applicant is responsible for community outreach."

There has been no community outreach. I have spoken with community members in Laburnum Park, in Sherwood Park, and in Ginter Place Condos and there has been zero meaningful community outreach. Each of these people, including those of us most directly impacted, only saw the drawings of this proposed amendment this week. These have apparently been on file with the city for almost a year and no one has shared them with us or even mentioned it. We had no way of knowing. They apparently have already applied for permits to install lighting for these tennis courts, according to the Richmond Permit Portal, and probably would have already started installation had there not been an administrative hold placed.

Officials with the city have told me that state and local law requires only five days' notice — while this might be true for zoning in general, I would think that the interrelated nature of the CUP, with restrictions that concern all lots, should warrant substantially greater notice. Presumably, the

requirement for Veritas to do community engagement should have rectified this. Even in the absence of a CUP, an applicant for approval for such a drastically non-conforming use should, at the very least, contact their neighbors. Veritas shirked that responsibility.

I first became aware of this tennis court idea—idea, not application for amendment—November 14, 2023, because a community leader who I am acquainted with happened to mention a public meeting of the Ginter Park Residents Association where Veritas would discuss their ideas. I went.

I have spoken with two Ginter Park residents this week who remembered the meeting and hearing me speak there.

At this meeting, Veritas materially misrepresented the status of the CUP, the status of their negotiations about dissolving the CUP, and their communication with my family, and made a series of untrue claims about our neighbor and his and plans for his home.

The Veritas representative at that time claimed that they were just about to get sign-off on dissolving the CUP from all concerned parties. This was not true. At that time, no representative of Veritas had ever spoken with my wife or me. And, although I cannot speak for my neighbor in the CUP, I will say that from what I know of his interaction with Veritas it appeared that Veritas's representative at that meeting misrepresented those discussions, as well, in addition to claiming that my neighbor didn't live in Richmond, was remodeling his home to flip it or turn it into an AirBnB, and didn't care one way or the other about the neighborhood or the lot. That was all false: Our neighbor lives there, he has turned an old house into a remarkable one-of-a-kind home for himself, and he is a prominent Richmond business owner.

They claimed that they did not need anyone's consent to dissolve the CUP and that they were just going to do it — I'm not sure it was in those words, although it was certainly in those words on my doorstep the next week. That was a lie. Last year I found an email which I had previously missed dated May 11, 2022, in which the attorney who handled our closing forwarded to me the text of one email he had received from Veritas's then-attorney, and it read, in pertinent part: "The Community Unit Plan (associated with the now defunct Ukrop family and a predecessor developer to build out the entirety of the old hospital site in a mixed residential format – only the condo tower was ever developed) has to be formally abandoned for Veritas to proceed with its rezoning as agreed with the neighbors.... This zoning issue is important to the family residential property owner because the owner would need to consent to the abandonment of the CUP."

Please note that the email was not to us but to attorneys for our home closing, though there was no legal or ethical reason not to reach out to

me, and that the email did not mention tennis courts or anything like that. The email, in fact, indicated that Veritas was merely interested in rezoning because I, as homeowner, "would prefer a by-right zoning category instead of being a single family residences (sic) somehow locked into a sprawling, defunct Institutional zoning CUP." Our zoning preference was none of their concern, at best, and at worst the suggestion was misleading.

At that time, apparently Veritas knew that the CUP could not be unilaterally dissolved. I believe they knew that sooner, too, because I spoke with the previous owners of our home this week, and he related to me that Veritas approached them to get consent on leaving the CUP prior to their sale. They were trying to get the previous owners to consent to dissolution of the CUP (for free) as they listed their home for sale — this is likely because it is and always has been Veritas's goal to dissolve this CUP so that they might continue their expansion into Laburnum Park.

Upon learning that effected parties in the CUP were adamantly opposed to dissolution, they then changed their line and instead argued that the tennis courts were an allowed use under the CUP. This was all nonsense.

Later in that Ginter Park Residents meeting, I stated that I was an owner of CUP property, that I did not consent, that this was the first I was hearing about this tennis courts business, and that I didn't approve of it. At that, the Veritas representative then threatened that if I, and I'm paraphrasing though only slightly, "thought I had some say in what they do with their land then shouldn't they have a say in what [I] did with [my] land." I felt that this was a bizarre and inappropriate attempt at public intimidation that I did not appreciate.

The same threat was repeated to me the following week when, at long last, a representative from Veritas came to my door and knocked. During that visit, he told me that they could dissolve the CUP unilaterally (they couldn't), that tennis courts were a conforming use (they weren't), that Veritas could do whatever it wanted to the CUP (they couldn't), and I didn't have any say in it, and that Veritas could have some say in what happened on our property. I am not paraphrasing now: He then insulted me and said that he was surprised I knew any big words. That is not an exaggeration. He literally said to me, and I'm quoting from memory, "Oh, wow, I wouldn't have thought you knew any words that big." On my front porch. He then asked to go into my back yard to look around.

That is the extent of the "community engagement" that Veritas has had with us, and I don't think it meets the standards required of this application process.

## **5. Passage of This Amendment Would be an Affront to Richmond**

## **Residents**

No one wants or expects to wake up one day to find that someone has built six tennis courts in their backyard, yet that is what Veritas is proposing. Not only would this significantly impact the value of our home, not only would it be harmful to our peaceful enjoyment of our home, but it would also steal from us the value of our lot's membership in this CUP. The CUP was passed by the City Council after due deliberation and, with the needs of the neighborhood and the greater community in mind, that lot was designated for residences. At the public meeting I mentioned, the Veritas representative said that they were "surprised" to learn some years after their purchase that this CUP existed on top of zoning restrictions. On the one hand, I find this also hard to believe, as it was not the only part of the CUP they had purchased, but on the other hand I am shocked and not at all sympathetic: My wife and I are just two people trying to make a good life here in Richmond, raise some kids, and put them through public school; we aren't an institution with millions of dollars in endowment, a tax exemption, and a large law firm on retainer, and yet we knew about the CUP when we purchased our home.

We purchased our home in reliance on the protections in the CUP and in reliance that a good faith City Council would honor those and would not bend to the will of a moneyed private school who seemingly doesn't care about the needs of the City of Richmond. We thought that we could be sure that the lot would eventually be put to a use that serves the needs of our community and that wouldn't drastically impair the value and enjoyment of our home. We have been happy here and we have continued to invest in beautifying our home, remodeling and adding an addition and an ADU, and in being good neighbors. We love the community we have developed on Gloucester Road. In the past days, I have spoken with all my neighbors and with several people in the neighborhood who don't live on our block, and I feel like I can share that no one I have spoken with is happy about this process; many of us feel ignored at best and lied to at worst.

I ask that the planning department not approve this amendment, and if for some reason it does, that the City Council reject it.

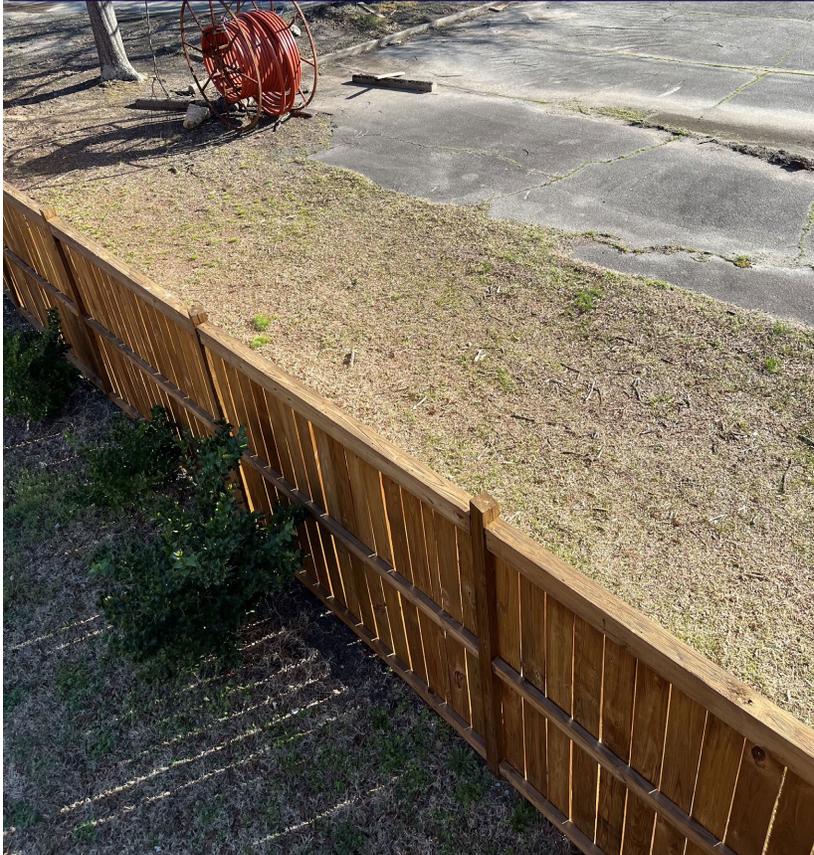
I would also like this to serve as objection to dissolution of the CUP, which I have heard rumors that Veritas is also asking for. Normally I would not bother addressing rumors, but the present application was on file for almost a year before any of us heard about it so I think it's better to be safe than sorry.

Thank you for your time and attention to this matter.

Sincerely,  
Tyler Coulson

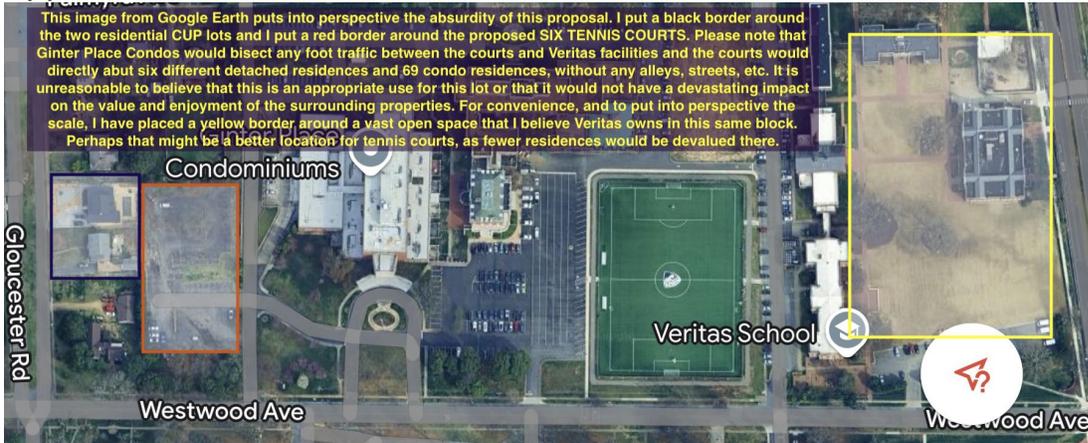
APPENDIX A

This picture is the view from our back yard ADU, which I use as a home office primarily evenings and weekends, when tennis would be played; it is also a planned future home for our parents as they age. You can see that the fence would be within the existing green space extremely close to our EXISTING structure and ADU. There is no other tennis court in Richmond remotely as close as this to a residence.

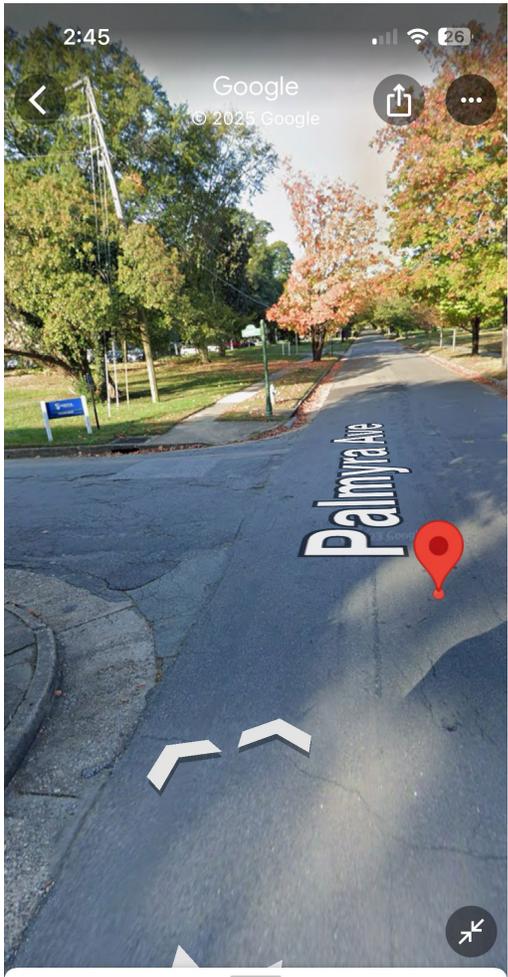


Appendix B

This image from Google Earth puts into perspective the absurdity of this proposal. I put a black border around the two residential CUP lots and I put a red border around the proposed SIX TENNIS COURTS. Please note that Ginter Place Condos would bisect any foot traffic between the courts and Veritas facilities and the courts would directly abut six different detached residences and 69 condo residences, without any alleys, streets, etc. It is unreasonable to believe that this is an appropriate use for this lot or that it would not have a devastating impact on the value and enjoyment of the surrounding properties. For convenience, and to put into perspective the scale, I have placed a yellow border around a vast open space that I believe Veritas owns in this same block. Perhaps that might be a better location for tennis courts, as fewer residences would be devalued there.



APPENDIX C



1293 Palmyra Ave

1 year ago · [See more dates](#) >



1293 Palmyra Ave

1 year ago · [See more dates](#) >



1293 Palmyra Ave

1 year ago · [See more dates](#) >



1208 Palmyra Ave

1 year ago · [See more dates](#) >



March 31. Veritas Objection and Public Comment...

**From:** [Katelin Heim](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** Yes to Veritas Tennis Courts  
**Date:** Monday, March 31, 2025 10:15:03 AM

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Hi Shaianna,

My name is Katelin, and I live at 1507 Wilmington Ave. I am writing to express my support for the amendment to the Community Unit Plan to reduce the number of parking spaces and allow for the construction of the tennis courts.

I would love tennis courts closer to our house to be able to teach my kids and think this is a wonderful idea! Personally, I also need an excuse to be more active.

I also support reducing the required parking spaces to 200. Veritas has managed parking exceptionally well during large events—I live just a block away and have never had any issues. I would much rather see more recreational space than unused parking lots.

I strongly encourage you to support this amendment, and please feel free to reach out if you have any questions!

Best,

Katelin & Brett Heim  
1507 Wilmington Ave

Richmond, VA 23227

**From:** [Carson Overstreet Glossop](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [jmullen](#); [Glossop, Simon \(Energy\)](#)  
**Subject:** Veritas Tennis Courts  
**Date:** Tuesday, April 1, 2025 2:26:21 PM

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Dear Ms. Trump,

I hope this email finds you doing well. I am writing on behalf of my family in support of the amendment to the Community Unit Plan to reduce the number of parking spots to allow Veritas School to construct tennis courts.

We live two blocks from Veritas School. The school consistently does everything in its power to be a good neighbor: events are always well managed, the grounds are well maintained, there are no parking issues for events large or small, and the school is responsive to neighborhood concerns. We feel fortunate that the school has done so much to revitalize this area of the Northside. It is slowly renovating and revitalizing its campus, thus benefiting everyone in the neighborhood; areas that had--prior to the school's ownership--become dilapidated and run down are now looking fresh, clean, well-maintained and attractive. In short, helping to make the Northside of Richmond a desirable place to live, work and do business.

We have no doubt that this demonstrated excellence in thought, planning, execution and upkeep will be reflected in anything that the school builds--tennis courts would be no exception. We would love to have tennis courts in the neighborhood as there is currently no public option. Its location would be a natural fit with the playground and track directly across the street. It is my understanding that the courts would be open to the public--when not in use by the school--as are the track and playground are also available to the public though all are privately owned. I think it would be of great benefit to the Ginter Park community. Our family would most certainly use the courts, and I have heard many others voice the same sentiment. With no neighborhood option, Ginter Park residents currently have to drive to the courts at Byrd, Bryan or Battery parks and those courts are often occupied. Courts on Westwood Avenue would provide a walkable, affordable (free) option.

We support reducing the number of parking spots in order to accommodate the building of the tennis courts. As referenced above, there have been no parking issues associated with Veritas. Since the parking spots where the tennis court would be built are not currently being utilized by anyone at this time, their reduction would make no difference to the parking situation. It is preferable to us to have tennis courts rather than an empty parking lot for numerous reasons including: attractiveness, safety and encouraging people to exercise.

In short, we would greatly appreciate your, the Planning Commission, and City Council's support in aiding the revitalization efforts of our neighborhood by approving the reduction of unused parking spots to allow for tennis courts to be built.

Sincerely,  
Carson & Simon Glossop  
3609 Brook Road  
Richmond, Virginia 23227  
804.477.5759

Website: <http://www.carsonoverstreet.com>

Instagram: CarsonOverstreet\_FineArt

**From:** [Paul, Elizabeth \(RCD-MTN\)](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [jmullen](#)  
**Subject:** Veritas Tennis Courts  
**Date:** Wednesday, April 9, 2025 9:51:53 AM  
**Attachments:** [image001\[79\].png](#)  
**Importance:** High

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Hi there!

My name is Elizabeth Paul, and I live at 1203 Laburnum Park Blvd, near the Veritas campus. I am writing in support of the amendment to the Community Unit Plan to reduce the number of parking spaces and to allow the construction of the tennis courts.

Veritas has been a great neighbor — not only to families who send their kids there, but to homes adjacent to the campus. The construction of the tennis courts will be a welcome addition to our community. While we've only been in Laburnum Park for three years, I understand that there used to be tennis courts on the adjacent property that were enjoyed on the Northside for many years. If neighborhood lore is correct, Arthur Ashe himself grew up on those courts — so the restoration of that amenity to this neighborhood is a great honoring of his legacy in the city.

I believe the courts will be nicely landscaped with a fence to keep balls from straying, and more courts in the neighborhood means more kids playing outside (instead of insight on screens), which only adds to the mental and physical health of Richmond kids). We look forward to cheering the children on in their tennis matches during the season.

I support reducing the number of required parking spaces to 200 total. Veritas does an amazing job with its larger events to manage parking and we do not believe the reduction in parking required will adversely impact the neighbors. Having additional recreational space is preferred to empty parking lots.

I appreciated the information the school provided to our association meeting regarding the new facilities on campus and other improvements. The school's work in removing vacant structures has increased safety and improved the aesthetics of the property. We expect the construction of the tennis courts will only continue the positive impact the school has had on the neighborhood.

I strongly encourage you to support the amendment to the Community Unit Plan.

Feel free to reach out with questions.

Best,  
Elizabeth

**Martin.** Elizabeth Paul  
**EVP / Chief Brand Officer**  
One Shockoe Plaza  
Richmond, VA 23219  
M 804.349.6838  
[martinagency.com](http://martinagency.com)

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**From:** [Trump, Shaianna L. - PDR](#)  
**To:** "[Teresa Davis](#)"  
**Subject:** RE: Veritas request for Cup amendment April 15th  
**Date:** Friday, April 11, 2025 10:02:00 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)

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Good morning,

Thank you for reaching out about this request. I will be sure to include your letter in the case documents.

I would like to clarify for you that the proposal does not include lighting. An internal error occurred, and a document showing lighting was wrongly added to the official file. When this case is heard at the Planning Commission meeting, Staff will be making an announcement to highlight and make sure that it is clear that there was an error. Mr. Nix was not incorrect, there will be no lighting at this site.

I hope that helps to clarify at least one thing for you!

Thank you,

Shaianna L. Trump (she/her)  
**Planner Associate**  
(o) 804-646-7319  
(e) [Shaianna.Trump2@rva.gov](mailto:Shaianna.Trump2@rva.gov)  
(w) [rva.gov/planning-development-review](http://rva.gov/planning-development-review)  
(m) 900 E. Broad St., Room 511, Richmond, Va. 23219-1907

How am I doing? Please contact my supervisor at [leo.mantey@rva.gov](mailto:leo.mantey@rva.gov)

---

**From:** Teresa Davis <[tcmd17@gmail.com](mailto:tcmd17@gmail.com)>  
**Sent:** Wednesday, April 9, 2025 6:28 PM  
**To:** Trump, Shaianna L. - PDR <[Shaianna.Trump2@rva.gov](mailto:Shaianna.Trump2@rva.gov)>  
**Subject:** Veritas request for Cup amendment April 15th

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Please include my response in the Staff recommendation report.  
I am writing in response to a request by Veritas School to amend the exiting CUP to allow tennis courts on the parcel at 1400 Westwood Avenue.  
I am against this adjustment to the CUP because it backs up existing homes and is directly across from Ginter Place, where I reside.  
Placing six tennis courts on this small parcel will cause numerous issues for the neighbors and

neighborhood.

In addition the plan lacks adequate screening and noise buffers. The existing proposal shows that there no trees to replace the existing 10+ shrubs and trees that will be removed in the buffer area fronting on Westwood Avenue.

The existing proposal indicates that lighting be included? We were assured by Keith Nix at a Ginter Place Master Plan meeting in April 2024, that there would be no lights, which also add to additional noise and additional light pollution for the residents at Ginter Place.

There are no additional trees added to buffer next to the neighbors on Gloucester Avenue. The noise from school children and any neighbors playing on the courts will be echoing throughout immediate area.

There is no parking in the immediate area for parents or anyone visiting to play on the courts.

Westwood Avenue has limited parking. T

Veritas has limited parking at the back of Ginter Place.

As a resident on the West Side of Ginter I am concerned about the noise that can be heard from the courts from early morning until sunset, as well as the concern of extra traffic going in and out of the driveway that provides Ginter Place residents their access to to our parking garage. Safety and unauthorized parking in the driveway is a large concern.

I respectfully request that the Planning Commission vote no on this project, as it exists.

Thank you

Teresa M Davis  
1350 Westwood Avenue

Teresa M Davis  
[Tcmd17@gmail.com](mailto:Tcmd17@gmail.com)

**From:** [Johnson, Theresa](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [jmullen](#); [Williams, Derrell](#)  
**Subject:** Veritas Tennis Courts  
**Date:** Friday, April 11, 2025 6:13:10 PM

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Hello Ms. Trump,

My name is Theresa Johnson and I am a VP for Community Advancement for the YMCA of Greater Richmond. For twelve years (until just a week ago), I served as the Executive Director of the Northside Y. I am also a city resident; I've lived in the Bellevue neighborhood for the past seventeen years.

For the past several years, Veritas has allowed the Northside Y to use its sports fields for our youth sports programs. Initially we used the front lawn area of the campus. More recently, we have used the turf fields that were installed a few years ago. This opportunity has been incredibly important, as our Y is land locked and we do not have our own fields. It has allowed us to serve more children, providing the opportunity for them to learn new skills, develop friendships, and learn to be part of a team.

Our experience with Veritas has been nothing but positive. The administration has been helpful and supportive when we have used their fields. The Veritas campus has been a great resource for the Y and for children and families in our community. Veritas has truly been a good neighbor in the Northside.

We support Veritas's efforts to develop its property to include tennis courts that will be available for neighborhood use. As a resident of the Northside, I remember the community's concern about losing public courts years ago when The Canopy apartments were developed. I'm sure that neighbors will enjoy the opportunity to play tennis on new courts, that are conveniently located in the Northside.

The Y has been invited to use the courts for programs and we appreciate that as a possibility for future programming.

I'm including Derrell Williams on this email. Derrell has served as the Operations Director/Director of Experience at the Northside Y for the past three years and has worked closely with the Veritas team around use of field space.

Please do not hesitate to reach out to us if you have questions. Thank you!

Theresa Johnson (She/Her/Hers)  
Vice President of Community Advancement  
YMCA OF GREATER RICHMOND  
Office: 804.729.4573  
Cell: 804-868-8855

Website: [ymcarichmond.org](http://ymcarichmond.org)



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**From:** [Jennifer Mullen](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Letter of Support For Tennis Courts - City Council  
**Date:** Friday, April 11, 2025 3:42:14 PM

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Dear City Council Members,

I live in Laburnum Park at 1201 Laburnum Park Blvd and fully support the proposed amendment to the Community Unit Plan to reduce the number of parking spaces and to allow the construction of the tennis courts at Veritas School.

Veritas has been a great neighbor and we appreciate all that they are doing to steward their resources for the good of their students as well as the surrounding community. We welcome the construction of tennis courts and believe they will be a beautiful addition to the neighborhood. The tennis courts formerly located on the adjacent property were frequently used by neighbors and the new courts will fit in well with tasteful landscaping and appropriate tennis court fencing. A tennis program is a great athletic program the school offers which promotes students' physical and mental health and teaches valuable lessons, applicable on and off the court. I look forward to cheering the children on in their tennis matches during the season, and hope to make good use of them myself!

I also support reducing the number of required parking spaces to 200 total. Veritas has done an excellent job with its larger events to manage parking, and as a close neighbor to the campus, I have not been adversely impacted when those events have occurred. Having thoughtfully designed additional recreational space is preferred to empty parking lots.

The school's work in removing vacant structures has increased safety and improved the aesthetics of the property. We expect the construction of the tennis courts will only continue the positive impact the school has had on the neighborhood.

I strongly encourage you to support the amendment to the Community Unit Plan.

Best,  
Chaney Widmer

--

Chaney Widmer  
[chaney.widmer@gmail.com](mailto:chaney.widmer@gmail.com)  
(703) 927-0735



**From:** [Jennifer Mullen](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Letter of Support for Veritas Tennis Court Project  
**Date:** Monday, April 14, 2025 10:31:58 AM

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Jennifer D. Mullen, Esq.  
804-977-3374

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I live at 1326 Brookland Parkway and support the amendment to the Community Unit Plan to reduce the number of parking spaces and to allow the construction of the Veritas tennis courts.

We live only a block away and Veritas has been a great neighbor. The construction of tennis courts in the neighborhood is a welcomed asset. The tennis courts formerly located on the adjacent Westwood Tract were frequently used by neighbors and the new courts bring back this amenity to the neighborhood. The courts will be nicely landscaped with sound silencing panels and an appropriate tennis court fence to keep the balls in the courts. The Veritas Tennis program promotes students' physical and mental health and teaches valuable lessons, applicable on and off the court.

I support reducing the number of required parking spaces to 200 total. Veritas has done a good job with its larger events to manage parking and we do not believe the reduction in parking required will adversely impact the neighbors. Having additional recreational space is preferred and safer than having empty parking lots.

I appreciated the information the school provided to our association meeting regarding the new facilities on campus and other improvements. The school's work in removing vacant structures has increased safety and improved the aesthetics of the property. We expect the construction of the tennis courts will only continue the positive impact the school has had on the neighborhood.

I strongly encourage you to support the amendment to the Community Unit Plan.

Sincerely,

Adam and Beth Sitterding  
1326 Brookland Parkway  
Richmond, VA 23227



**From:** [Corinne Beasley](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [jmullen](#); [dkinard@veritasschool.com](mailto:dkinard@veritasschool.com)  
**Subject:** Veritas Tennis Courts - Dept of Planning & Development Review  
**Date:** Monday, April 14, 2025 11:05:53 AM  
**Attachments:** [Veritas Tennis Courts Letter to DCP.pdf](#)

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April 14, 2025

Dear Ms. Trump,

As an urban planner, and Professor of Real Estate at Georgetown University, I am writing to express my tremendous support of the Tennis Courts at the Veritas School on the Northside. While I am in personal favor of this new recreational space as my children attend the school, we chose to live in Westover Hills when we relocated to Richmond 2 years ago, rather than the Northside, due to its lack of access to public open space.

The Northside has historically had less access to public open space and recreational areas, compared to some other neighborhoods in the City of Richmond. While proximate to Bryan Park, the walkable nature of Ginter Park and other parts of the Northside make local tennis courts even more valuable than big sports fields found within driving distance to Bryan Park. As a dense urban neighborhood, a private party willing to build more recreational park space seems like a win-win-win for everyone involved – the City, the school, and its neighbors.

In addition, the strategies and actions in the City's RVAGreen 2050 Plan "*aim to provide more equitable access to healthy natural spaces... and engage the natural environment to decrease greenhouse gas emissions and increase resilience to the impacts of climate change. Accomplishing these strategies will create co-benefits including more beautiful neighborhoods ...[and]... protecting human health...*" One of the Environmental strategies in this Plan includes "*Mak[ing] sure all residents have the opportunity to engage with healthy and natural resources, spaces, and biodiversity.*" (<https://www.rvagreen2050.com/environment>) These tennis courts would support the sustainability, resilience and social equity goals of this Plan by increasing the amount of semi-permeable space (in the City as a whole), reducing the environmental impact especially on infrastructure (compared to the previous hospital use or an alternative building use). Lastly, looking to the history of this neighborhood, tennis courts were once fully integrated into the urban fabric right across the street, and this improvement will help continue the legacy that Arthur Ashe has already left throughout the City.

Approving this proposal allows the City to provide another amenity to its residents in the form of community tennis courts at no cost to the City. Preventing these tennis courts from being built would in fact hold the City responsible for permitting the continuance of a blighted vacant lot. This is not a liability you want on your conscience. There is a plethora of data on the effects of blighted vacant lots on property values and crime rates, not to mention the opposing argument that tennis courts could enhance neighbors' property values and in turn their city tax bill.

While NIMBYism is an expected part of any changes in any neighborhood, the goal of the City Planning department and City Council is to be sure decisions are made for the long-term benefit of the collective whole.

I highly recommend your approval of this community amenity, as it would add to both the neighborhood and the City's overall green footprint, supporting long-term quality of life goals that the City can use to attract people, companies, and continue growth in the right direction.

Feel free to contact me with any further questions.

Sincerely,

Corinne Packard Beasley

--

Corinne Packard Beasley  
Assistant Professor of the Practice  
MPRE Real Estate Program  
Georgetown University School of Continuing Studies  
640 Massachusetts Ave NW, Room C141  
Washington, DC 20001  
(917) 940-4765 (cell)

**From:** [Susan Fitzpatrick](#)  
**To:** [Oliver, Alyson E. - PDR](#); [PDR Land Use Admin](#); [Trump, Shaianna L. - PDR](#)  
**Cc:** [Gibson, Kenya J. - City Council](#); [Elliott, Sarandon C. - City Council](#)  
**Subject:** Ordinance No. 2025-046-Community Unit Plan Amendment  
**Date:** Monday, April 14, 2025 12:38:03 PM

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Good morning,

I am writing to express concerns over the Veritas Tennis Courts Ordinance. I ask that you please share this letter with all planning commissioners and include it in the Staff Recommendations Report.

My full legal name is Susan Adele Fitzpatrick. For the past twelve years, I have been a resident of Ginter Place Condominiums. All three bedrooms of my home face the space to become tennis courts.

In the twelve years I have lived here, Veritas has been a good neighbor whose actions have demonstrated good faith toward Ginter Place Condominiums and toward other neighbors.

However, in the case of the planned tennis courts, there have been troubling inconsistencies in communicating specifics of the plan.

After Ginter Place was told repeatedly that there would be no lights for the courts so that usage would end after dark, illustrated plans have been shared that include lighting.

Ginter Place residents have raised concerns about noise. With six courts, there is the potential for twenty-four people to play tennis at one time in close proximity to our homes. I am concerned that planned sound barriers will be insufficient to keep the noise from destroying the peaceful enjoyment of my home. I have the same concern for many neighbors whose homes are in close proximity.

Residents have also raised legitimate concerns about parking for users of the court. It is inevitable that tennis court users will illegally park in private outdoor parking spaces which are needed to owners of Ginter Place Condominiums.

Finally, safety is another concern. The proposed tennis courts are adjacent to our main driveway, and every effort should be taken to prevent someone chasing a loose tennis ball from running in the path of cars as residents of 69 units come and go to our homes.

I ask that the CUP amendment be either rejected, or postponed until the following elements can be clearly identified as being included in the final plans:

1. No lighting that would allow usage of the tennis courts except during daylight;

2. Sound barriers all the way around the tennis courts rather than just at the corners, and all other noise mitigation efforts possible given close proximity to so many homes;
3. Clear and highly visible signage regarding parking, including reminding visitors that Ginter Place Condominium parking spaces are private property and that towing will be pursued;
4. Overhead netting and/or fencing to contain errant tennis balls to the court area and away from driveways with heavy traffic.

Thank you for your consideration.

Sincerely,

Susan Adele Fitzpatrick, Ph. D.  
1350 Westwood Avenue  
Unit 801  
Richmond, Virginia 23227  
Phone 804.305.5416

[Sent from AOL on Android](#)

**From:** [Lillian Dean](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [Kenya.gobson@rva.gov](mailto:Kenya.gobson@rva.gov); [Elliott, Sarandon C. - City Council](#)  
**Subject:** Ordinance No. 2025-046 - Community Unit Plan Amendment (eg The Veritas Tennis Courts Ordinance)  
**Date:** Monday, April 14, 2025 3:00:33 PM

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To: City Planning and Land Use Associate, Shaianna Trump  
Fr: Lillian F. Dean, FAICP, Ginter Place resident, Richmond  
Re: REQUEST TO POSTPONE ORDINANCE AMENDMENTS, re. Veritas Tennis Courts Proposal

Dear Ms.Trump,.

The Ginter Place community and Northside residents will be directly impacted by any tennis courts constructed by Veritas.

The construction of 6 - 9 tennis courts, directly adjacent residential property is not sound land use planning.

The specifics of the Veritas tennis court proposal have changed numerous times. Clearly, the size of the development is too large for the neighborhood - and the provision to “invite” the community to use the tennis courts after school hours is counterproductive.

Please postpone consideration of Ordinance No. 2025-046 - Community Unit Plan Amendment — e.g., Veritas Tennis Courts Ordinance.

A postponements of 3 months will allow the affected parties to meet together to develop essential changes to the proposal.

Lillian F. Dean  
Ginter Place Condominiums  
1350 Westwood, #202  
Richmond, Va. 23227  
248-225-7928

**From:** [Kathleen Sadler](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** Ordinance No. 2025-046  
**Date:** Monday, April 14, 2025 3:44:16 PM

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To: Shaianna Trump, City Planning and Land Use Associate

## **We want this letter to be included in the Staff Recommendation Report**

RE: Ordinance No. 2025-046, Community Unit Plan Amendment

We are residents of Ginter Place Condo, 1350 Westwood Avenue, Richmond, Virginia 23227. We have concerns about the proposed tennis courts planned by the Veritas School for the parcel of land immediately west of our Ginter Place Condominium. The main Veritas campus lies immediately to the east of our condo building which is literally “sandwiched” between the two Veritas properties. We believe that the installation of tennis courts will cause a considerable disruption to our residence and quality of life. Below are some of the concerns:

- **Parking:** Without a dedicated parking area at the tennis courts for the Veritas players, their families, friends, and visiting teams, it is likely to create unwanted traffic and infringement on the areas devoted to our private parking spaces. As it is, our signage has had limited success in dissuading vehicles from using our **privately owned** spaces. Pedestrians, bicyclists, and skateboarders frequently ignore our private property signs as if they did not exist.

- **Open Neighborhood Use of Tennis Courts:** While we believe that Veritas School will try to

supervise their scheduled events according to their rules, we are very opposed to their stance of open neighborhood use.

Unregulated participation on the courts that have no set time limits or hours of the day, will create an untenable living environment for those of us who live at Ginter Place Condos, especially for the units that face the proposed tennis courts. This “open” invitation to the neighborhood will obviously lead to more trespassing on our private property, use of our private parking, etc.

• Noise: The added noise that the tennis courts events will bring is obvious. Even though Veritas School is installing sound equipment for the tennis balls, it has nothing to abate the people noise for competitive events and routine practice.

• Lighting: We understand that electricity installation on this tennis court property is part of the Veritas School proposal for tennis ball noise abatement and gate control, but not for lighting. If their project is approved, who is going to prevent Veritas School from installing lighting for night time use?

If this project is allowed to go forward, we respectfully request that strict limits be applied in writing to address these concerns as well as written means of enforcing any breach thereof. We do not represent any organizations and we do not have any economic or professional relationships that would be affected by the adoption of this legislation.

Respectfully submitted,

Nelson Calisch and Kathleen Sadler, Residents of Ginter Place Condo

1350 Westwood Avenue, Unit 309

Richmond, Virginia 23227

**From:** [Ann Foster Marriner](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [John Marriner](#)  
**Subject:** Ord. No. 2025-046 (Modification of CUP for the Development of Veritas Tennis Courts)  
**Date:** Monday, April 14, 2025 4:13:10 PM

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To: Shaianna Trump  
City Planning and Land Use Associate

From: John and Ann Foster Marriner

Please include our letter below in the Staff Recommendations Report for this ordinance.

+++++

April 12, 2025

Dear Planning Commission Chair and Members:

We own Unit 311 in the Ginter Place Condominiums (1350 Westwood Avenue). We are writing to oppose the approval of the proposal which would allow Veritas School to build six tennis courts on the adjacent property. Our unit is on the west side of the building and partially faces the site.

Our concerns include:

The parcel is too small for six tennis courts and does not allow for effective buffers between the courts and the neighboring properties.

The plan shows lighting installed on the courts. We understand that at a recent meeting Veritas representatives told neighbors they are not installing lighting "at this time," but that they are wiring for them for the future.

Ginter Place is wedged between the proposed site and the Veritas main campus which is a distance away. We understand that during school events, parents, students and visitors will be expected to park and use bathroom facilities on the main campus. That will generate considerable pedestrian traffic across and around the Ginter Place property and likely affect our ability to access to our own parking. Emergency Medical Services responding to calls from Ginter Place must use the driveway that leads from Westwood Avenue to the rear entrance of the building. The driveway runs along the east side of proposed courts. Stray cars and pedestrian traffic in that driveway

could slow what is already convoluted access and egress for EMS.

Veritas states that, when not being used by the school, the courts will be open for neighborhood use from 8:00 am to dusk. Listening to the sound of tennis balls being hit for up to 12 hours a day would be intolerable for the residents of Ginter Place and other adjacent neighbors. Aside from the noise, open use will likely invite trespassing on our property and use of our individual parking spaces. While Veritas may plan to post signs listing rules for the use of the courts, they will be meaningless without a mechanism for enforcement.

We are greatly concerned that this proposal will result in a negative impact on our property values, quality of life and the surrounding neighborhood.

Thank you for your consideration.

Sincerely,

John Marriner and Ann Foster Marriner

1350 Westwood Ave., Unit 311

[jfmarriner@mindspring.com](mailto:jfmarriner@mindspring.com)

[afmarriner@mindspring.com](mailto:afmarriner@mindspring.com)

*Note: We do not represent any organization. We have no economic or professional relationships that would be affected by the adoption of this legislation.*

April 14, 2025

City of Richmond  
Planning Commission

RE: Ordinance No. 2025-046

My name is Christopher Allen Hilbert and I write to you, not as a representative of any organization and I have no economic or professional relationships that would be affected by the adoption of this ordinance. I live at 1350 Westwood Av., Unit 508, Richmond, VA 23227 which abuts the subject property. I have lived in the Ginter Place Condominiums since 2014 and I am a 30-year resident of Ginter Park. From my perspective, as a taxpaying citizen, I am entitled to the quiet enjoyment of my home and the intrusive noise of SIX tennis courts is an unreasonable burden for me and my neighbors to bare. I have a balcony to my unit which would face the courts. There is simply no way to ensure that the noise will be tolerable when I am on my balcony. I am most likely to be out there when the weather is nice which will coincide with the most likely time that the tennis courts will be used. While my situation will be bad, the houses on Gloucester Av will face an absolute intolerable situation. The noise level SIX tennis courts would make 15 feet from the property line is unacceptable by any reasonable standard.

Veritas is proposing that these SIX tennis courts will be open to the public when not in use by the school. It has been called a “neighborhood amenity”. I can’t imagine a more perverse claim of generosity. While the administrators, students, teachers and parents of Veritas will be enjoying the relative quiet of their homes, my neighbors and I will be listening the noise of their “gift to the neighborhood.” Their unwillingness to police their own property leaves us exposed to the real possibility of people playing tennis from sun up to sun down.

I served on Richmond City Council for 16 years. I always prided myself on being a reason arbiter of land use issues before Council. I cannot recall a more intrusive proposal to come before our body during that time. I know the Northside Community as well as anyone, and I can testify that unsavory urination, defecation, illicit sexual activity happens to unattended properties during the night. Veritas offering to put up security cameras will do little to nothing to deter this activity. In a true sense of the word, they would be abandoning the responsibility to maintain their property for their own safety and that of the community.

Finally, there is no on-street parking on the northside of the 1400 block of Westwood Av. The major entrance and exit of Ginter Place will be right up to the property line. Veritas children and others will be in the direct line of cars entering and exiting our property. There will certainly be a few dozen people at the school’s tennis matches and the area will not be able to accommodate the parking or the traffic from those entering and leaving our homes.

It is most unfortunate that Veritas School purchased this property without the ability to develop it for their intended use. However, my neighbors and I should not pay the response cost for their miscalculation. I take no joy in opposing this ordinance. I truly enjoy the sounds of the children of Veritas School playing during the week, but that does not extend to listening to the “racket” (pardon the pun), of SIX tennis courts. I have very close and friendly relationships with several Veritas families. They are good people, with whom I have prayed, cried, laughed and broken bread. However, they are simply proposing that you adopt an unreasonable ordinance.

While some letters may be asking that you continue this paper, I respectfully request that you vote no on this ordinance on April 15, 2025. There are simply no changes that could substantially improve this fatally-flawed paper. Please pardon the length of this letter, but I feel very passionately about the quiet enjoyment and value of my hearth and home. No one else can or should do that for me. I very much want to remain in my beloved Ginter Park, my home for three decades. However, that may not be possible, if this ordinance is adopted.

Respectfully,

Christopher Allen Hilbert

**This letter is in support of Veritas School applying for a zoning variance to allow the building of tennis courts on Westwood Avenue in Richmond, VA. scheduled to be heard April 15, 2025.**

My name is Marsha L. Penick. I am a resident and condominium owner in Ginter Place. My address is 1350 Westwood Avenue, Unit 408, Richmond, VA. 23227. My cell phone number is 609-658-0572. I own a condo on the west side of the building (the side facing the area of the proposed tennis courts). I have no professional relationship with this matter and feel that there is no economic impact affecting the value of my condominium or any other facet of my life.

The purpose of this letter is to address the concerns about any noise that may be created by the presence of the proposed tennis courts.

The Ginter Place neighborhood is a relatively quiet neighborhood but it is a city neighborhood located within earshot of Interstate 95.

The current, routine noises heard routinely on the west side of Ginter Place include:

- Constant sounds of traffic on I-95
- Train whistles and the sounds of operating trains
- Sounds of birds, wind and local traffic
- Fireworks from the nearby baseball stadium

Non-routine sounds include:

- Sirens of Police and Fire vehicles
- Children and adults at the park directly across Westwood Avenue
- Other sounds consistent with city living

Most residents would be surprised by the list of these sounds because they are so used to these sounds that they are no longer aware of them. Residents who say that this is a quiet neighborhood are speaking the truth though their country and suburban counterparts might be surprised.

In conclusion, I believe whatever sounds emanate from tennis courts will be minimal and will soon become background noise that will not interfere with residents' enjoyment of their property.

Thank you for including this letter in your deliberations.

Marsha Penick

**From:** [Oliver, Alyson E. - PDR](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Ordinance No. 2025-046  
**Date:** Tuesday, April 15, 2025 8:55:49 AM

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**From:** Kathleen Sadler <kathnel@verizon.net>  
**Sent:** Monday, April 14, 2025 3:31 PM  
**To:** Oliver, Alyson E. - PDR <Alyson.Oliver@rva.gov>  
**Subject:** Ordinance No. 2025-046

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TO: Alyson Oliver, Planning Commission Secretary

RE: Ordinance No. 2025-046, Community Unit Plan Amendment

We are residents of Ginter Place Condo, 1350 Westwood Avenue, Richmond, Virginia 23227. We have concerns about the proposed tennis courts planned by the Veritas School for the parcel of land immediately west of our Ginter Place Condominium. The main Veritas campus lies immediately to the east of our condo building which is literally “sandwiched” between the two Veritas properties. We believe that the installation of tennis courts will cause a considerable disruption to our residence and quality of life. Below are some of the concerns:

- **Parking:** Without a dedicated parking area at the tennis courts for the Veritas players, their families, friends, and visiting teams, it is likely to create unwanted traffic and infringement on the areas devoted to our private parking spaces. As it is, our signage has had limited success in dissuading vehicles from using our **privately owned** spaces. Pedestrians, bicyclists, and skateboarders frequently ignore our private property signs as if they did not exist.

- Open Neighborhood Use of Tennis Courts: While we believe that Veritas School will try to supervise their scheduled events according to their rules, we are very opposed to their stance of open neighborhood use. Unregulated participation on the courts that have no set time limits or hours of the day, will create an untenable living environment for those of us who live at Ginter Place Condos, especially for the units that face the proposed tennis courts. This “open’ invitation to the neighborhood will obviously lead to more trespassing on our private property, use of our private parking, etc.
- Noise: The added noise that the tennis courts events will bring is obvious. Even though Veritas School is installing sound equipment for the tennis balls, it has nothing to abate the people noise for competitive events and routine practice.
- Lighting: We understand that electricity installation on this tennis court property is part of the Veritas School proposal for tennis ball noise abatement and gate control, but not for lighting. If their project is approved, who is going to prevent Veritas School from installing lighting for night time use?

If this project is allowed to go forward, we respectfully request that strict limits be applied in writing to address these concerns as well as written means of enforcing any breach thereof. We do not represent any organizations and we do not have any economic or professional relationships that would be affected by the adoption of this legislation.

Respectfully submitted,

Nelson Calisch and Kathleen Sadler, Residents of Ginter Place Condo

1350 Westwood Avenue, Unit 309

Richmond, Virginia 23227

**From:** [Oliver, Alyson E. - PDR](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Ord. No. 2025-046 (Modification of CUP for the Development of Veritas Tennis Courts)  
**Date:** Tuesday, April 15, 2025 8:56:05 AM

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**From:** Ann Foster Marriner <afmarriner@mindspring.com>  
**Sent:** Monday, April 14, 2025 4:03 PM  
**To:** Oliver, Alyson E. - PDR <Alyson.Oliver@rva.gov>  
**Cc:** PDR Land Use Admin <dcdLandUseAdm@rva.gov>; John Marriner <jfmarriner@mindspring.com>  
**Subject:** Ord. No. 2025-046 (Modification of CUP for the Development of Veritas Tennis Courts)

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To: Alyson Oliver, Planning Commission Secretary

From: John and Ann Foster Marriner

Please provide the chair and each member of the Planning Commission a copy of our letter below.

April 14, 2025

Dear Planning Commission Chair and Members:

We own Unit 311 in the Ginter Place Condominiums (1350 Westwood Avenue). We are writing to oppose the approval of the proposal which would allow Veritas School to build six tennis courts on the adjacent property. Our unit is on the west side of the building and partially faces the site.

Our concerns include:

The parcel is too small for six tennis courts and does not allow for effective buffers between the courts and the neighboring properties.

The plan shows lighting installed on the courts. We understand that at a recent meeting Veritas representatives told neighbors they are not installing lighting "at this time," but that they are

wiring for them for the future.

Ginter Place is wedged between the proposed site and the Veritas main campus which is a distance away. We understand that during school events, parents, students and visitors will be expected to park and use bathroom facilities on the main campus. That will generate considerable pedestrian traffic across and around the Ginter Place property and likely affect our ability to access to our own parking. Emergency Medical Services responding to calls from Ginter Place must use the driveway that leads from Westwood Avenue to the rear entrance of the building. The driveway runs along the east side of proposed courts. Stray cars and pedestrian traffic in that driveway could slow what is already convoluted access and egress for EMS.

Veritas states that, when not being used by the school, the courts will be open for neighborhood use from 8:00 am to dusk. Listening to the sound of tennis balls being hit for up to 12 hours a day would be intolerable for the residents of Ginter Place and other adjacent neighbors. Aside from the noise, open use will likely invite trespassing on our property and use of our individual parking spaces. While Veritas may plan to post signs listing rules for the use of the courts, they will be meaningless without a mechanism for enforcement.

We are greatly concerned that this proposal will result in a negative impact on our property values, quality of life and the surrounding neighborhood.

Thank you for your consideration.

Sincerely,

John Marriner and Ann Foster Marriner

1350 Westwood Ave., Unit 311

[jfmarriner@mindspring.com](mailto:jfmarriner@mindspring.com)

[afmarriner@mindspring.com](mailto:afmarriner@mindspring.com)

*Note: We do not represent any organization. We have no economic or professional relationships that would be affected by the adoption of this legislation.*

**From:** [PDR Land Use Admin](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Ordinance No. 2025-046  
**Date:** Tuesday, April 15, 2025 9:00:48 AM

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**From:** Kathleen Sadler <kathnel@verizon.net>  
**Sent:** Monday, April 14, 2025 3:38 PM  
**To:** PDR Land Use Admin <dcdLandUseAdm@rva.gov>  
**Subject:** Ordinance No. 2025-046

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## **We want every Commissioner to have this letter**

RE: Ordinance No. 2025-046, Community Unit Plan Amendment

We are residents of Ginter Place Condo, 1350 Westwood Avenue, Richmond, Virginia 23227. We have concerns about the proposed tennis courts planned by the Veritas School for the parcel of land immediately west of our Ginter Place Condominium. The main Veritas campus lies immediately to the east of our condo building which is literally “sandwiched” between the two Veritas properties. We believe that the installation of tennis courts will cause a considerable disruption to our residence and quality of life. Below are some of the concerns:

- **Parking:** Without a dedicated parking area at the tennis courts for the Veritas players, their families, friends, and visiting teams, it is likely to create unwanted traffic and infringement on the areas devoted to our private parking spaces. As it is, our signage has had limited success in dissuading vehicles from using our **privately owned** spaces. Pedestrians, bicyclists, and skateboarders frequently ignore our private property signs as if they did not exist.

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Respectfully submitted,

Nelson Calisch and Kathleen Sadler, Residents of Ginter Place Condo

1350 Westwood Avenue, Unit 309

Richmond, Virginia 23227

**From:** [PDR Land Use Admin](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Subject:** FW: Veritas Tennis Courts  
**Date:** Tuesday, April 15, 2025 9:00:55 AM

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**From:** Jim Rosen <[jimsoccernut@gmail.com](mailto:jimsoccernut@gmail.com)>  
**Sent:** Monday, April 14, 2025 1:41 PM  
**To:** PDR Land Use Admin <[dcdLandUseAdm@rva.gov](mailto:dcdLandUseAdm@rva.gov)>  
**Subject:** Re: Veritas Tennis Courts

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Forgot to mention my address is 1350 Westwood Ave unit 808, Richmond, VA 23227

On Mon, Apr 14, 2025, 1:19 PM Jim Rosen <[jimsoccernut@gmail.com](mailto:jimsoccernut@gmail.com)> wrote:

Good afternoon.

My name is James Rosen. I live in Ginter place and I support veritas tennis courts. I can think of nothing better to have built next to us. The children are our future..

Richmond City Planning Commission

Re: Ordinance No. 2025-046- Community Unit Plan Amendment

As long- time residents of Ginter Place Condominiums (14 years) we wish to offer our wholehearted support of the planned Veritas Tennis Courts Ordinance, provided that adequate provisions are made for sound abatement, low level security lighting, and ball control fencing. No lighting towers should be constructed and buffering plantings must be installed in accordance with City regulations. In addition, we would ask that pickleball not be allowed.

Respectfully submitted for your consideration,

[Philip W. Nichols and Maryanne MacMurren](#)

1350 Westwood Avenue, Unit 107

Richmond, VA 23227

**From:** [Tyler Coulson](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [Gibson, Kenya J. - City Council](#); [Oliver, Alyson E. - PDR](#); [Elliott, Sarandon C. - City Council](#)  
**Subject:** 1402 Westwood Zoning Comment  
**Date:** Tuesday, April 15, 2025 10:48:52 AM

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Richmond Planning Department  
Shaianna Trump  
Planner Associate  
[shaianna.trump2@rva.gov](mailto:shaianna.trump2@rva.gov)

To Richmond Planning Department,

My name is Tyler Coulson, and I live at 3407 Gloucester with my wife and two young children. I object to the proposed amendment to the Community Unit Plan (CUP) covering the lot at 1402 Westwood for reasons included in my previous public comment, as well as the following objections:

- 1) The Final Plan Amendment as proposed does not meet the requirements of the Community Unit Plan;
- 2) The Application fails to address serious questions raised by the community;
- 3) In addition to the failure to meet CUP requirements, the Amendment could cause substantial additional legal issues;
- 4) The proposed courts would be a massive, private tennis complex that would destroy the residential nature of our entire city block.

Following continuance of this matter two weeks ago, Veritas distributed a flyer and letter on April 3 informing neighbors of a public information session to be held at 8 a.m. in the morning, Wednesday, April 9. The flyer included an inaccurate drawing of the courts that included many trees and was not to scale. The letter included an inaccurate discussion of the zoning history and future of the 1402 Westwood lot, in which Veritas claimed that this tennis court project is part of their plan to rezone their whole campus as Institutional to prevent multi-family development like the Canopy Apartments. I have heard this repeated by many people in the neighborhood over the last several weeks, and it simply is not true. 1402 Westwood is currently zoned I and has been since at least 2003; it is designated for townhouses under the CUP and as residential for single family detached dwellings under the Richmond future land use rezoning plan.

Although my objections will reference some things that were discussed at that information session, I do not want to imply that the information session was in any way meaningful, much less sufficient, community engagement.

### **1. Applicant's request as proposed does not meet the requirements of the Community Unit Plan.**

Section X(A) of the Community Unit Plan requires 15-foot buffer zones planted with deciduous and evergreen trees. The Applicant's Final Plan Amendment violates this requirement repeatedly along the western portion of the lot in question. Their renderings include fencing and paved tennis court sections within 9.6 feet of our lot line and the fenced and paved area is within the required buffer all the way to its southern ending point. It is within twelve feet of my southern neighbor's lot line for the entire length of it.

At a "public meeting" at Veritas, held at 8 a.m. on a Wednesday, Veritas's attorney stated that the fence and part of the tennis court pavement were allowed within the buffer because the City was allowing it. I disagree. If a 10-foot fence and an actual, physical part of the tennis court is allowed in the buffer, then "buffer" doesn't really mean "buffer".

Veritas also indicated that the buffer only applied to the area adjoining the CUP properties on Gloucester. This is not accurate. The language is as follows:

"A. BUFFERS: A landscaped buffer area of a minimum of fifteen (15) feet in width shall be provided along Westwood Avenue, Palmyra Avenue and the adjacent residential properties to the west. The landscaping shall include a combination of evergreen and deciduous trees and shrubs. Evergreen trees and shrubs shall be predominant along the perimeters of the Property adjacent to residential uses."

The CUP seems clear that there must be a 15 foot landscaped buffer between all adjoining residences.

The amendment as proposed fails to provide adequate trees within the inadequately drawn buffer. The only plants added under their application are 36" shrubs, though the CUP clearly requires trees. They seem to count a line of trees at the southern end of the lot as part of their buffer — IE, they've said these are "existing evergreen trees — to remain". As noted in my previous comment two weeks ago, these trees belong to my neighbor; they are not on the lot in question and do not belong to Veritas. They can't be included in calculating the required buffer and their inclusion in the drawing was misleading.

Additionally, there is a transformer proposed in the inadequate buffer they

have suggested. At the public meeting, Veritas claimed that trees could not be planted there because there are underground power lines. That is not true. In fact, their proposal includes a 15 foot easement granted to Dominion for the burying of power lines — that would violate the CUP in itself. The CUP does not allow granting a power line easement in the buffer required between the lot and the residential houses adjoining it, and especially not one that would make it impossible to plant the required trees.

Additionally, the drawings provided in the amendment appear to not include the 8 and 1/2 foot tall brick wall at the northern end of the lot. This wall is protected by Section XI(C) of the CUP.

The Amendment as applied for would violate the CUP itself, let alone any additional zoning requirements.

For these reasons, it should not be approved.

## **2. The Application fails to address serious questions raised by the community, which Veritas representatives seem to have acknowledged.**

As I discussed at length in my previous comment of two weeks ago, Veritas failed to engage in meaningful community engagement prior to their application, and in zero community engagement with neighboring properties in the period between their application and the Amendment's first appearance on the Planning Commission agenda. Following its continuance, Veritas scheduled a public meeting... at 8 A.M. on a Wednesday morning.

Nearly every person I talked with about this meeting actually laughed out loud when they heard the date and time. The community engagement meeting on this was held at 8 A.M. on the Wednesday just four business days before the Planning Commission hearing to vote on this. While this was a very convenient time and place for anyone who works at Veritas or who has to drop children off for school in the morning, it prevented all of my neighbors except for myself and one other from attending. I had to find childcare — a babysitter for 8 a.m., which is not easy — and my children missed over an hour and a half of school at the First Baptist Preschool, just so I could attend.

At that meeting, residents raised numerous incredibly important issues. These included, but are not limited to:

- Electric light restriction;
- Game time restriction;
- Restriction on number of games;
- Restrictions on tournaments;

- Lack of adequate bathroom facilities;
- Security camera issues;
- Amplified announcement restrictions;
- Scoreboard restrictions;
- Pickleball restrictions;
- Etc.

I asked when would be the appropriate time for these restrictions to be included in writing, and they said "during the Final Plan stage". I asked for clarification if any of these were included in the application, and they said they were not. I, and others I spoke with, were left feeling confused about these answers. Veritas seemed either to agree that these were great ideas or else shrugged them off as something they wouldn't ever consider doing. But when pressed on the inclusion of these restrictions in the plan, they seemed to say that, on the one hand, these should be included at the final plan stage, but on the other hand that they were not included in the final plan. They said that this was the Final Plan, and the restrictions are not in the Final Plan, but that they should be included in the Final Plan. It might be that there is some other stage of development that would be the "final plan" stage — however, their application is marked "FINAL PLAN" and they stated repeatedly in opening remarks that this was the Final Plan.

Further, when asked if they had done any traffic impact studies or parking impact studies, Veritas responded "What do you mean?" And then discussed various groundwater and other issues that the planning department reviews. So as of this date, we still have not seen any statements regarding how many people might attend games or how much traffic might increase or how much need for parking might increase. I believe their representative said something along the lines of it being hard to imagine more than five cars coming to a match. I can't recall if it was 5 or 10, but it was impossibly low, and with absolutely no data to back this up. We still have no idea how many games would be in their schedule, what match attendance looks like, etc. But I note that people in my neighborhood have remarked that there are normally 30 - 50 cars parked in their lot when there are soccer or lacrosse matches, with at least 100 people in attendance.

This lack of transparency and information is doubly problematic because the proposal does not include any restroom or water facilities. That means that people using the courts will either have to walk to Veritas for facilities, which will increase foot traffic across a highly used driveway, or else put in portable toilets. There are no portable toilet restrictions in this application but they would not be welcome or appropriate inside a residential city block.

I would like to reincorporate essentially all of my objections from my previous comment, except for my objection regarding Lamont Street, which I was able to verify is a privately owned drive.

For these reasons, it should not be approved.

### **3. In addition to the failure to meet CUP requirements, the Amendment could cause substantial additional legal issues.**

Amendment of this CUP is not appropriate at this time due to potential additional legal issues. It is my understanding that Veritas is actively negotiating for dissolution of the CUP with the Ginter Place Condos. It is my understanding that they are negotiating the redrawing of lot lines which will increase Ginter Place Condos' lot, in exchange for which the Condo Board would support dissolving the CUP. I understand, though I am not a party to these talks, that these problems are due to the manner in which the sale of 1402 Westwood took place. It is inappropriate to deal with the present CUP amendment now, especially at the applicant's request, when the applicant is seeking to dissolve the CUP — all current community action, and all proposed restrictions, etc., are all happening in the context of this CUP, which the applicant is seeking to dissolve. That's not a fair way to deal with neighbors.

The CUP provides protections for neighbors on Palmyra, on Westwood, and on Gloucester — even homes on Gloucester not a part of the CUP. Dissolution of the CUP — which becomes much more likely in the event of this egregious tennis court plan being pushed through — would negatively impact the entire neighborhood.

Involuntary dissolution of the CUP without input and adjustments for the two single family detached houses created or repurposed under the CUP could cause further legal issues, just as would allowing this plan to go forward despite violating the words and spirit of the CUP. This amendment, much like the plan to dissolve the CUP, materially impacts the value and the quiet enjoyment of the CUP properties on Gloucester.

It is inappropriate for this amendment to move forward in light of these other potential issues, and should not be approved for these reasons.

### **4. The Amendment Would Rip a Residential neighborhood in two with a massive, private tennis complex.**

Finally, I would like to discuss the issue of public access to these courts. As I noted at length in my previous comment, even if these were open for public use, that would be a negative impact on the surrounding homes. It would destroy the residential character of this side of our city block. But these courts will not be public, despite Veritas's promises.

Veritas in their flyer to the neighborhood (which included a materially misleading drawing, as well as numerous claims that are not included in

this proposed amendment), stated that these courts would be open to the public. They claimed that they would “replace” four public use courts lost during some other completely unrelated development in the Westwood Tract. Setting aside for a second that there are ten public use courts in Battery Park not to mention the 18 courts going in the VCU Athletic Village, courts in this proposal will not be public.

Governments, municipalities, and the like can provide public facilities. But when private organizations provide so-called “public” benefits, we must all remember that it is a two-way street. Veritas may very well believe that their courts will be open for public use, although I doubt that. But even if they do mean that, many people in our own neighborhood would feel neither welcome nor safe using those courts.

As their handbook makes clear, they are not open to students who do not live according to their interpretation of biblical material, nor to students whose parents do not.

*"As a covenantal Christian school, Veritas serves children of believing parents. We require that parents be professing Christians and be committed to a Christ-centered "paideia"...Therefore, as a covenant community of parents, staff, faculty, and students, we abide by Biblical principles of Christian conduct. Words and actions which are expressly forbidden in Scripture, including but not limited to blasphemy, profanity, dishonesty, theft, drunkenness, sexual intimacy outside marriage, and homosexual practice, are not acceptable."*

Their accreditation board’s guidelines make it even clearer:

*"Principle: Schools are made up of students, faculty, and programs. Each plays a vital role in forming paideia in students. If families enroll that uphold values in juxtaposition with the school community, they will disrupt the school’s ethos. In other words, students will be in conflict over acceptance of what is taught, and what is present in the community. This is particularly evident with false values around LGBT inclusion or non-Christian enrollment (Mormon, Muslim)."*

There are wonderful people in our own neighborhood and all across this beautiful City who would not even be allowed to enroll in that school because of their marriages, their sexuality, their belief systems. This is a school that apparently won’t allow a kid to enroll if his mother or father is Jewish, Muslim, Buddhist, Mormon, Sikh, Hindu, atheist or igtheist. They won’t allow their students to live in their own sexuality, nor to enroll if they are homosexual or their parents are homosexual.

So no, these would not be open to the public, even if they were “open to the public”.

I thank you all for your time and consideration in this matter, and I invite any member of the Planning Commission to come to my house and see what this proposal looks like in reality before considering it. The proposal drawings are ridiculous, but here on the ground it becomes clear just how ridiculous this proposal is and how much actual damage it would do to the surrounding homes and neighborhood.

This amendment and plan should not be approved, and I ask that you vote no.

Sincerely,  
Tyler Coulson

**From:** [Tyler Coulson](#)  
**To:** [Trump, Shaianna L. - PDR](#)  
**Cc:** [Gibson, Kenya J. - City Council](#); [Oliver, Alyson E. - PDR](#); [Elliott, Sarandon C. - City Council](#)  
**Subject:** 1402 Westwood Zoning Comment  
**Date:** Tuesday, April 15, 2025 10:48:52 AM

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Richmond Planning Department  
Shaianna Trump  
Planner Associate  
[shaianna.trump2@rva.gov](mailto:shaianna.trump2@rva.gov)

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- 3) In addition to the failure to meet CUP requirements, the Amendment could cause substantial additional legal issues;
- 4) The proposed courts would be a massive, private tennis complex that would destroy the residential nature of our entire city block.

Following continuance of this matter two weeks ago, Veritas distributed a flyer and letter on April 3 informing neighbors of a public information session to be held at 8 a.m. in the morning, Wednesday, April 9. The flyer included an inaccurate drawing of the courts that included many trees and was not to scale. The letter included an inaccurate discussion of the zoning history and future of the 1402 Westwood lot, in which Veritas claimed that this tennis court project is part of their plan to rezone their whole campus as Institutional to prevent multi-family development like the Canopy Apartments. I have heard this repeated by many people in the neighborhood over the last several weeks, and it simply is not true. 1402 Westwood is currently zoned I and has been since at least 2003; it is designated for townhouses under the CUP and as residential for single family detached dwellings under the Richmond future land use rezoning plan.

Although my objections will reference some things that were discussed at that information session, I do not want to imply that the information session was in any way meaningful, much less sufficient, community engagement.

### **1. Applicant's request as proposed does not meet the requirements of the Community Unit Plan.**

Section X(A) of the Community Unit Plan requires 15-foot buffer zones planted with deciduous and evergreen trees. The Applicant's Final Plan Amendment violates this requirement repeatedly along the western portion of the lot in question. Their renderings include fencing and paved tennis court sections within 9.6 feet of our lot line and the fenced and paved area is within the required buffer all the way to its southern ending point. It is within twelve feet of my southern neighbor's lot line for the entire length of it.

At a "public meeting" at Veritas, held at 8 a.m. on a Wednesday, Veritas's attorney stated that the fence and part of the tennis court pavement were allowed within the buffer because the City was allowing it. I disagree. If a 10-foot fence and an actual, physical part of the tennis court is allowed in the buffer, then "buffer" doesn't really mean "buffer".

Veritas also indicated that the buffer only applied to the area adjoining the CUP properties on Gloucester. This is not accurate. The language is as follows:

"A. BUFFERS: A landscaped buffer area of a minimum of fifteen (15) feet in width shall be provided along Westwood Avenue, Palmyra Avenue and the adjacent residential properties to the west. The landscaping shall include a combination of evergreen and deciduous trees and shrubs. Evergreen trees and shrubs shall be predominant along the perimeters of the Property adjacent to residential uses."

The CUP seems clear that there must be a 15 foot landscaped buffer between all adjoining residences.

The amendment as proposed fails to provide adequate trees within the inadequately drawn buffer. The only plants added under their application are 36" shrubs, though the CUP clearly requires trees. They seem to count a line of trees at the southern end of the lot as part of their buffer — IE, they've said these are "existing evergreen trees — to remain". As noted in my previous comment two weeks ago, these trees belong to my neighbor; they are not on the lot in question and do not belong to Veritas. They can't be included in calculating the required buffer and their inclusion in the drawing was misleading.

Additionally, there is a transformer proposed in the inadequate buffer they

have suggested. At the public meeting, Veritas claimed that trees could not be planted there because there are underground power lines. That is not true. In fact, their proposal includes a 15 foot easement granted to Dominion for the burying of power lines — that would violate the CUP in itself. The CUP does not allow granting a power line easement in the buffer required between the lot and the residential houses adjoining it, and especially not one that would make it impossible to plant the required trees.

Additionally, the drawings provided in the amendment appear to not include the 8 and 1/2 foot tall brick wall at the northern end of the lot. This wall is protected by Section XI(C) of the CUP.

The Amendment as applied for would violate the CUP itself, let alone any additional zoning requirements.

For these reasons, it should not be approved.

## **2. The Application fails to address serious questions raised by the community, which Veritas representatives seem to have acknowledged.**

As I discussed at length in my previous comment of two weeks ago, Veritas failed to engage in meaningful community engagement prior to their application, and in zero community engagement with neighboring properties in the period between their application and the Amendment's first appearance on the Planning Commission agenda. Following its continuance, Veritas scheduled a public meeting... at 8 A.M. on a Wednesday morning.

Nearly every person I talked with about this meeting actually laughed out loud when they heard the date and time. The community engagement meeting on this was held at 8 A.M. on the Wednesday just four business days before the Planning Commission hearing to vote on this. While this was a very convenient time and place for anyone who works at Veritas or who has to drop children off for school in the morning, it prevented all of my neighbors except for myself and one other from attending. I had to find childcare — a babysitter for 8 a.m., which is not easy — and my children missed over an hour and a half of school at the First Baptist Preschool, just so I could attend.

At that meeting, residents raised numerous incredibly important issues. These included, but are not limited to:

- Electric light restriction;
- Game time restriction;
- Restriction on number of games;
- Restrictions on tournaments;

- Lack of adequate bathroom facilities;
- Security camera issues;
- Amplified announcement restrictions;
- Scoreboard restrictions;
- Pickleball restrictions;
- Etc.

I asked when would be the appropriate time for these restrictions to be included in writing, and they said “during the Final Plan stage”. I asked for clarification if any of these were included in the application, and they said they were not. I, and others I spoke with, were left feeling confused about these answers. Veritas seemed either to agree that these were great ideas or else shrugged them off as something they wouldn’t ever consider doing. But when pressed on the inclusion of these restrictions in the plan, they seemed to say that, on the one hand, these should be included at the final plan stage, but on the other hand that they were not included in the final plan. They said that this was the Final Plan, and the restrictions are not in the Final Plan, but that they should be included in the Final Plan. It might be that there is some other stage of development that would be the “final plan” stage — however, their application is marked “FINAL PLAN” and they stated repeatedly in opening remarks that this was the Final Plan.

Further, when asked if they had done any traffic impact studies or parking impact studies, Veritas responded “What do you mean?” And then discussed various groundwater and other issues that the planning department reviews. So as of this date, we still have not seen any statements regarding how many people might attend games or how much traffic might increase or how much need for parking might increase. I believe their representative said something along the lines of it being hard to imagine more than five cars coming to a match. I can’t recall if it was 5 or 10, but it was impossibly low, and with absolutely no data to back this up. We still have no idea how many games would be in their schedule, what match attendance looks like, etc. But I note that people in my neighborhood have remarked that there are normally 30 - 50 cars parked in their lot when there are soccer or lacrosse matches, with at least 100 people in attendance.

This lack of transparency and information is doubly problematic because the proposal does not include any restroom or water facilities. That means that people using the courts will either have to walk to Veritas for facilities, which will increase foot traffic across a highly used driveway, or else put in portable toilets. There are no portable toilet restrictions in this application but they would not be welcome or appropriate inside a residential city block.

I would like to reincorporate essentially all of my objections from my previous comment, except for my objection regarding Lamont Street, which I was able to verify is a privately owned drive.

For these reasons, it should not be approved.

**3. In addition to the failure to meet CUP requirements, the Amendment could cause substantial additional legal issues.**

Amendment of this CUP is not appropriate at this time due to potential additional legal issues. It is my understanding that Veritas is actively negotiating for dissolution of the CUP with the Ginter Place Condos. It is my understanding that they are negotiating the redrawing of lot lines which will increase Ginter Place Condos' lot, in exchange for which the Condo Board would support dissolving the CUP. I understand, though I am not a party to these talks, that these problems are due to the manner in which the sale of 1402 Westwood took place. It is inappropriate to deal with the present CUP amendment now, especially at the applicant's request, when the applicant is seeking to dissolve the CUP — all current community action, and all proposed restrictions, etc., are all happening in the context of this CUP, which the applicant is seeking to dissolve. That's not a fair way to deal with neighbors.

The CUP provides protections for neighbors on Palmyra, on Westwood, and on Gloucester — even homes on Gloucester not a part of the CUP. Dissolution of the CUP — which becomes much more likely in the event of this egregious tennis court plan being pushed through — would negatively impact the entire neighborhood.

Involuntary dissolution of the CUP without input and adjustments for the two single family detached houses created or repurposed under the CUP could cause further legal issues, just as would allowing this plan to go forward despite violating the words and spirit of the CUP. This amendment, much like the plan to dissolve the CUP, materially impacts the value and the quiet enjoyment of the CUP properties on Gloucester.

It is inappropriate for this amendment to move forward in light of these other potential issues, and should not be approved for these reasons.

**4. The Amendment Would Rip a Residential neighborhood in two with a massive, private tennis complex.**

Finally, I would like to discuss the issue of public access to these courts. As I noted at length in my previous comment, even if these were open for public use, that would be a negative impact on the surrounding homes. It would destroy the residential character of this side of our city block. But these courts will not be public, despite Veritas's promises.

Veritas in their flyer to the neighborhood (which included a materially misleading drawing, as well as numerous claims that are not included in

this proposed amendment), stated that these courts would be open to the public. They claimed that they would “replace” four public use courts lost during some other completely unrelated development in the Westwood Tract. Setting aside for a second that there are ten public use courts in Battery Park not to mention the 18 courts going in the VCU Athletic Village, courts in this proposal will not be public.

Governments, municipalities, and the like can provide public facilities. But when private organizations provide so-called “public” benefits, we must all remember that it is a two-way street. Veritas may very well believe that their courts will be open for public use, although I doubt that. But even if they do mean that, many people in our own neighborhood would feel neither welcome nor safe using those courts.

As their handbook makes clear, they are not open to students who do not live according to their interpretation of biblical material, nor to students whose parents do not.

*"As a covenantal Christian school, Veritas serves children of believing parents. We require that parents be professing Christians and be committed to a Christ-centered "paideia"...Therefore, as a covenant community of parents, staff, faculty, and students, we abide by Biblical principles of Christian conduct. Words and actions which are expressly forbidden in Scripture, including but not limited to blasphemy, profanity, dishonesty, theft, drunkenness, sexual intimacy outside marriage, and homosexual practice, are not acceptable."*

Their accreditation board’s guidelines make it even clearer:

*"Principle: Schools are made up of students, faculty, and programs. Each plays a vital role in forming paideia in students. If families enroll that uphold values in juxtaposition with the school community, they will disrupt the school’s ethos. In other words, students will be in conflict over acceptance of what is taught, and what is present in the community. This is particularly evident with false values around LGBT inclusion or non-Christian enrollment (Mormon, Muslim)."*

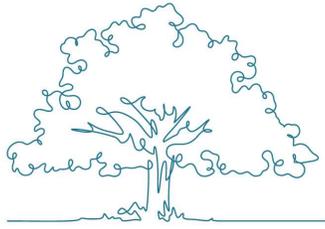
There are wonderful people in our own neighborhood and all across this beautiful City who would not even be allowed to enroll in that school because of their marriages, their sexuality, their belief systems. This is a school that apparently won’t allow a kid to enroll if his mother or father is Jewish, Muslim, Buddhist, Mormon, Sikh, Hindu, atheist or igtheist. They won’t allow their students to live in their own sexuality, nor to enroll if they are homosexual or their parents are homosexual.

So no, these would not be open to the public, even if they were “open to the public”.

I thank you all for your time and consideration in this matter, and I invite any member of the Planning Commission to come to my house and see what this proposal looks like in reality before considering it. The proposal drawings are ridiculous, but here on the ground it becomes clear just how ridiculous this proposal is and how much actual damage it would do to the surrounding homes and neighborhood.

This amendment and plan should not be approved, and I ask that you vote no.

Sincerely,  
Tyler Coulson



the  
**Ginter Park**  
RESIDENTS ASSOCIATION

April 15, 2025

Attention: Richmond Planning Commission

RE: Veritas School (ORD. 2025-046 Version: 1)

The Board of Directors of the Ginter Park Residents Association (the Board) has reviewed the request from Veritas School (ORD. 2025-046 Version: 1) regarding the construction of six tennis courts at 1402 Westwood Ave (Parcel ID: N0001330085). Over the past several weeks, residents of Ginter Place Condominiums and several adjoining single family homes have voiced their concern to the Board regarding the details of the proposed plan. These concerns include the following:

An apparent lack of clarity regarding any future plans for court lighting.

- The proposed narrow and very minimal buffer separating the courts from the adjoining homes to the west of the site.
- The impact on access to and from the parking garage entrance serving Ginter Place, particularly from Westwood Avenue, and possible conflicts between players/spectators and vehicles accessing the garage.
- Possible conflicts between resident vehicles and vehicles using the Ginter Place entry loop from Westwood to park or drop / pick up players.
- Possible conflicts between pupils crossing the Ginter Place front entry loop and vehicles in the loop.

Given these and other issues raised by residents, it is the position of the Board that the current paper before the planning Commission should be continued until ALL property owners whose property is currently part of the associated CUP and is affected by this proposal can come to a general agreement regarding the issues noted herein.

Stephen Weisensale, AIA, CSI  
Chair, GPRA Planning & Zoning Cmte  
zoning@ginterpark.org

**From:** [Susan Rebillot](#)  
**To:** [City Clerk's Office](#)  
**Cc:** [Elliott, Sarandon C. - City Council](#); [Gibson, Kenya J. - City Council](#); [Jordan, Katherine - City Council](#); [cynthia.newbille@rvva.gov](#); [ellen.robertson@rvva.gov](#); [Abubaker, Sarah M. - City Council](#); [Breton, Andrew S. - City Council](#); [Lynch, Stephanie A. - City Council Office](#); [Trammell, Reva M. - City Council](#)  
**Subject:** ORD. 2025-046, Veritas Amendment of CUP and Construction of tennis courts  
**Date:** Sunday, June 1, 2025 10:11:48 PM  
**Attachments:** [Ginter Place CUP amendment 10-13-2008 \(1\) \(1\).pdf](#)

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June 1, 2025

RE: ORD. 2025-046, Veritas Proposal to Amendment of CUP and Construction of tennis courts

Dear Honorable Council Members,

We are homeowners at Ginter Place Condominiums and are writing to respectfully request that you vote NO to both the request for reduced parking requirement that was established in the CUP, 2003 and amended 2008, and for the construction of six tennis courts as presented in the Veritas final plan. As members of our condominium association, we have attended meetings with Veritas representatives over the past six years to hear presentations regarding their evolving master plan draft and more recently have attended meetings where details were presented regarding the tennis court project. We appreciate their willingness when requested to engage in conversations with neighbors regarding concerns about the tennis court project, and we appreciate some of the voluntary contingencies that they offered.

However, the reality remains that the property is too small to shoehorn six tennis courts, and courts and competitive matches there will negatively impact the enjoyment of our homes. The courts will also likely cause problems for Ginter Place due to the bizarre platting of the parcels. The following is context for you regarding Ginter Place, which is an abutting neighbor to the proposed courts.

Ginter Place condo owners are in the unusual and challenging circumstance of having parcels of property to our east and west that were once owned by the developer of Ginter Place sold to Veritas without any adjustment of the platting of contiguous parcels of land that were once one institutional property and were later intended to be a residential development. So, the tennis court parcel includes the primary ingress and egress to Ginter Place and our secure parking garages and rear parking lot. It is a very busy driveway on Westwood Avenue, is immediately adjacent to the tennis court project parcel, and will be the only access point for the tennis courts.

In terms of the request for an amendment to Section VIII of the CUP to reduce parking requirements from 575 to 200 total spaces, the requirement refers to parking for all of the parcels, regardless of owner. So, we are unclear about the authority to allow one party to the CUP to amend the parking requirement since other parties to the CUP are impacted. Please refer to the CUP.

Ginter Place has 140 parking spaces divided between the secure parking garages and outdoor spaces. Ginter Place has 10 visitor spaces on our southeastern boundary. Veritas School has 675 students, and during two recent school events—one an end of school year event and one a state soccer tournament, Veritas parking spaces were full; their guests parked in Ginter Place visitor spaces; and there was on-street parking on a block of Westwood Avenue. Their master plan draft shows great reductions in parking spaces. Event and parking demands will only increase with expansion of the athletics program, building of a performing arts hall, and renovation of Laburnum House as an events venue. There is one residential building on campus, which requires parking spaces. The CUP amendment would require just 60 parking spaces for Veritas School for all functions?

In terms of the tennis court project, we oppose this project, because the parcel is too small to provide reasonable visual and sound buffers from abutting neighbors on Gloucester and those living at Ginter Place. We've learned that the sound suppression screening that they propose to apply to some portions of the fencing will only soften the sound for that section and the particular height of the fence. The enjoyment of our homes abutting the tennis courts will be negatively impacted in terms of noise and visual field. Since the courts will have no restroom facilities, there is the possibility of permanent portable toilets, which would be in view of our west side condos and objectionable to us.

We suggested to Keith Nix, Head of School, that the large, expansive green space to the east of Ginter Place off of Palmyra Avenue, adjacent to the site for the new gymnasium would be an ideal place for the tennis courts and would very likely face zero opposition. There would be no worry about tennis court guests entering the Ginter Place primary driveway in vehicles and parking in spaces that are deeded to Ginter Place homeowners out of confusion or convenience. The courts could be constructed adjacent to the new gymnasium, have easy access to parking, restrooms, and there is plenty of space for adequate buffers. Security would be easier for Veritas, as the courts would be within their campus grounds.

Finally, we would welcome residential development on the parcel in question. We have heard from Veritas representatives that if their request is not approved that they will sell the parcel to a developer and that townhomes may be constructed. Frankly, we would welcome additional residential units and development that is a good fit abutting other residential property.

Veritas has other viable options for construction of the tennis courts on their primary campus. They will make a very good profit on the sale of the parcel in question. Please do not approve this project. Thank you for your consideration.

Sincerely,  
Susan and John Rebillot  
1350 Westwood Avenue  
Unit 303  
Richmond, VA 23227