



June 11, 2019

Mr. Mathew Ebinger  
Secretary, City Planning Commission  
Department of Planning & Development Review  
900 East Broad Street, Suite 511  
Richmond, VA 23219  
[Matthew.Ebinger@richmondgov.com](mailto:Matthew.Ebinger@richmondgov.com)

RE: Subdivision of 2202- 2208 West Cary, 10 South Shields

Dear Mr. Ebinger,

I am writing on behalf of the owner and developers of the properties at 2202, 2206, 2208 West Cary and 10 South Shields, Sam Daniel and CaryShields Mews LLC. We are requesting to subdivide the existing four parcels into 19 lots for the development of 19 attached single-family homes, common area, parking and a public alley. The existing parcels are located in the R-63 Residential Multi-family Urban and front on both West Cary Street and South Shields Street. A 20' public alley runs parallel to West Cary Street and is adjacent to the property to the north.

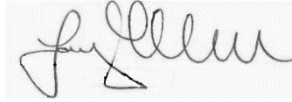
The existing lot depth is 178+/- feet for 2206 and 2208 West Cary and 120 +/- feet for 2202 West Cary. The property fronting South Shields is 123 +/- feet in depth. The proposed development of the property was approved by the City Planning Commission and City Council through a special use permit via Ordinance No. 2019-088, which authorized the lot layout and parking configuration. The parking is accessed off of the two existing alleys and in order to maximize it to serve the homes, the lot depth is less than 100 feet. Under the approved development scheme, the lots range from 59 to 78.5 feet.

Section 25-219 of the City's Subdivision Ordinance requires average lot depths of not less than 100 feet in dwelling districts. It is our position that the residential development is authorized by the existing special use permit approved by City Council and the Planning Commission and as such the requirement relevant to dwelling districts under the Zoning Ordinance is not applicable and no exception should be required for the proposed lot depths. However, if the City's interpretation is that an exception is required, this letter shall serve as the subdivider's request for such an exception.

The Commission may grant variations in the application of the Subdivision Ordinance when (1) A subdivider can show that, by reason of exceptional topographic conditions or other extraordinary or exceptional circumstances or conditions, the strict application of the sections of the chapter actually prohibit or unreasonably restrict the use of the property. The development as approved by City Council would be unreasonably restricted and prohibited should the lot depth be enforced.

We trust that the Planning Commission will concur with this finding and we thank you for your consideration of this request. Please feel free to contact me at [lory@markhamplanning.com](mailto:lory@markhamplanning.com) or (804) 248-2561 if you have any questions or require additional materials to process the application.

Sincerely,

A handwritten signature in black ink, appearing to read "Lory Markham", is centered on the page. The signature is written in a cursive style with a large initial "L" and "M".

Lory Markham