County of Albemarle
Community Development Department

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Memorandum

To: Valerie Long, vlong@williamsmullen.com; Megan Nedostup, mnedostup@williamsmullen.com

Date: October 9, 2026

Re: ZMA-2026-00010 Westminster-Canterbury of the Blue Ridge (WCBR) – *Preliminary Initial Review Comments*

Dear Mrs. Long and Ms. Nedostup:

First, thank you again for inviting County staff for a site visit on September 17, 2026. The visit and conversation with the entire applicant team provided helpful context for reviewing the application materials. We look forward to working with you to complete this review.

Staff have now completed a preliminary review of the zoning map amendment (ZMA) materials submitted on August 28, 2026, and are providing high-level review comments below. Staff believe additional information and feedback is necessary before a comprehensive analysis of the application, including detailed revisions to the application plan, code of development, and narrative. We would be glad to meet with you to discuss these comments and the overall application further. To be clear, the application remains on-track to proceed to work sessions with the Architectural Review Board (ARB) and Planning Commission (PC) as previously discussed.

Staff comment and analysis draws from the AC44 Comprehensive Plan and its supporting plans, including the Pantops Master Plan, Housing Albemarle, Economic Development Strategic Plan, and others, as well as the "factors to be considered" for all zoning map amendment applications specified in County Code §18-33.6(B) and applications to establish a planned development district in County Code §18-33.6(B)(1). Finally, there are supplemental regulations applicable to this use under Section 5.1.13 of the Zoning Ordinance.

Generally, the preliminary comments aim to recognize both positive aspects of the proposal and areas of concern. Comments are organized by the topic areas listed below:

1. Consistency with AC44, Future Land Use Map (FLUM), and Pantops Master Plan (PMP)
2. Housing Policy
3. Cultural and Scenic Resources
4. Environmental Stewardship
5. Impact to Public Safety Services
6. Transportation

Following the preliminary comments, there is discussion about next steps in the application process, including the required community meeting and tentatively scheduled work sessions with the ARB and PC. The required community meeting under Section 33.4(K)(6) must be held prior to this application being scheduled for public hearing. Staff believe the issues below should be discussed in a work session with the Planning Commission prior to public hearing.

1. Consistency with AC44 and Future Land Use Map (FLUM)

The application encompasses both the existing WCBR campus and the proposed expansion area. On the FLUM, the existing WCBR campus is located in the Urban Residential land use category, and the proposed expansion area includes the Neighborhood Residential and Green Systems land use categories. Staff is providing initial analysis on proposal's consistency with the land use categories in the proposed expansion area.

Land Use Categories in AC44 are recommendations, not regulations, and are intended to provide general guidance related to the desired primary uses, secondary uses, density ranges, and built form, including building height. The request for a "Continuing Care Retirement Facility" is considered a residential use under the Zoning Ordinance, which is consistent with the primary use of the Neighborhood Residential land use category. The secondary institutional and commercial uses are also consistent with the Neighborhood Residential land use category.

Here is an overall comparison of the proposed development within the expansion area to the Neighborhood Residential land use category:

	Neighborhood Residential	Expansion Area of ZMA-2026-00010
Primary Land Use	Residential	Residential
Secondary Land Use	Neighborhood-scale non-residential (school, commercial, retail, rel. assembly, institutional)	Non-residential (institutional, commercial)
Density	3-6 units per acre	Maximum of approx. 11.35 units per acre*
Building Form	Generally, 1-3 stories; building footprints typically less than 20,000 sq. ft.	Maximum of 12 stories; up to 50,000 sq. ft. building footprint (the building in Block 2)

* Calculation based on request for net addition of up to 519 new independent living units (ILUs) on 45.74 acres (gross acreage of expansion area). Total overall request is for 800 new ILUs; 281 ILUs on existing campus, which yields up to 519 ILUs within the expansion area. 519 units / 45.74 ac. = 11.35 units per acre.

Density can also be calculated for the project overall, which would still result in a density that exceeds the maximum recommended by the Neighborhood Residential land use category (800 units / 86.76 ac. = 9.22 units per acre).

As a result, the proposed density of units and building form (height and building footprint) are not consistent with the Neighborhood Residential land use category. Nevertheless, staff believe it is possible for the proposal to proceed with the ZMA review process, rather than a comprehensive plan amendment (CPA) based on the factors reaffirmed by the Board of Supervisors at their meeting on May 6, 2026.

In addition, staff agrees that taller buildings may be appropriate in certain circumstances and locations, and there can be benefits to concentrating height versus spreading lower height development across a larger footprint. However, we do not believe this location is part of or adjacent to an identified Activity Center within AC44 or the PMP. Please also note that the maximum height recommended within the most intense type of Activity Center in AC44 is 8 stories.

In sum, the proposal includes elements of both consistency and inconsistency with the Neighborhood Residential land use category. The proposal's overall intensity of development and taller built form within the Neighborhood Residential land use category will be a focus of the upcoming work session with the PC.

2. Housing Policy

As identified in the application narrative, there are aspects of the proposal that advance objectives from both the AC44 Housing chapter and the County's housing policy, Housing Albemarle. Staff acknowledges these benefits and also believes the affordability framework of Housing Albemarle should apply to the proposal.

The Office of Housing has requested additional information to assist staff in determining more precisely how Housing Albemarle and its objectives, including affordability for low and moderate income seniors, may be best addressed by the proposal. Please see the attached Housing comments from Shaqual Rennolds for more information about this topic.

3. Cultural and Scenic Resources

AC44 and the Pantops Master Plan acknowledge that cultural resources encompass a variety of features, including but not limited to buildings, landscapes, mountains, waterways, archaeological resources, sites, views, and dark skies, and that these elements play a critical role in establishing the character of the community.

The PMP also emphasizes character in its land use chapter, especially the protection of existing residential neighborhoods. The Plan states this protection "can be accomplished by balancing the size, scale, and location of new developments with the character of surrounding neighborhoods."

The scope and scale of this application are likely to generate impacts (both positive and negative) to surrounding neighborhoods. Information, including site sections and elevations, should be provided with vantage points not only from the Entrance Corridor, but for affected surrounding residential neighborhoods.

Preliminary comments on impacts to the Entrance Corridor overlay district are provided by Margaret Maliszewski and will be expanded following a work session with the ARB. Importantly, a viewshed analysis is recommended to aid staff's review and recommendation.

In addition, archaeological resources may be present on the site and an archaeological assessment conducted by a qualified professional archaeologist in the areas to be disturbed is recommended. See additional comments related to Historic Preservation from Khris Taggart.

4. Environmental Stewardship

The FLUM and PMP identify greenspace areas within the project. AC44 Community Design Guidelines for Site Design encourage respecting natural terrain, especially slopes greater than 25% and slopes along waterways during development. In addition, regraded slopes should be smoothed out and abrupt or steep grades should be avoided.

Regarding waterways, a wetland and stream study was provided with the application materials; however, County Code requires stream analysis using specific Virginia Department of Environmental Quality (DEQ) guidelines (specifically, the guidance entitled "Determinations of Water Bodies with Perennial Flow," dated September 2003, or latest revision, issued by DEQ). The Engineering Division has requested additional information under these guidelines to confirm the status of the stream.

In addition, the application narrative requests approval of disturbance of steep slopes to facilitate necessary improvements. Disturbance of Steep Slopes-Preserved may be allowed if expressly authorized on the application plan. The application narrative notes that "Final wall design, height, and location will be determined during site plan review with County staff to ensure compliance with applicable standards and the intent of this approval."

Staff is not comfortable with this approach without additional information given the recommendations of AC44 and the master plan. The PMP recognizes hillsides for both their ecological and aesthetic value. The application plan will need to be updated to clearly show any slopes disturbance and also quantify it in approximate square footage. The narrative must provide an analysis of the characteristics of the slopes in Section 30.7.3. Likewise, the conceptual grading plan appears to propose retaining walls between 8 and 30 feet in height. Some walls are labeled as "max height X' retaining wall" and others are labeled as "stepped wall, max retained height = X'." Please provide more information about the differences between the retaining walls and stepped retaining walls, including the distance between steps and the maximum height of each step.

Finally, the PMP also calls for development proposals to evaluate the existing canopy coverage within project boundaries and examine how it relates to adjacent forested areas (see page 52 of PMP). Please address tree canopy expectations in the updated application narrative. Based on discussion during the site visit on September 17th, staff believes additional tree canopy information may become available as part of the architectural design process. Please consider including this information in future submittals as part of the application plan, if possible.

5. Impact to Public Safety Services

The provision of emergency services to both the existing campus and expansion area will be an important focus of the review. Fire Rescue (F/R) noted that assisted living beds generate higher demand for F/R services than other residential types. They also shared that call volumes have increased year-over-year for the past few years. An individual site generating this demand for emergency services represents a significant impact. F/R is currently compiling specific figures on its responses to the site to provide more data for review and discussion.

In addition, F/R expressed concern about the sufficiency of existing infrastructure to adequately ensure public safety. They noted failures of the existing private pump system and temporary pump system that provide fire flow to the existing campus, which resulted in a "fire watch" status until the systems could be restored.

Staff acknowledges the applicant has been proactive in working with ACSA on the design of a second private pump system to serve the expansion area. Staff will need the Fire Marshal's Office to confirm adequate fire protection will be available to the existing campus and expansion area as required by Section 5.1.13(b) and other sections of County Code. Additional information may be needed to determine adequate fire suppression is planned.

Finally, as more information becomes available, staff anticipates requesting changes to the application plan to ensure that adequate emergency access is provided to the proposed buildings.

6. Transportation

At this stage of the review, there are three areas to note related to transportation.

First, a scoping meeting for a traffic impact analysis (TIA) was held with staff from Timmons Engineering, Albemarle County, and the Virginia Department of Transportation (VDOT) on September 29, 2026. County transportation planning staff and VDOT staff will provide transportation comments once the applicant submits a complete TIA.

Second, the applicant acknowledges VDOT has identified a park-and-ride lot on the property and respectfully suggests the park-and-ride function would be better served at another more compatible location. The transportation project that will include constructing the park-and-ride lot is funded and programmed into VDOT's Six-Year Improvement Program. County staff is coordinating with VDOT and the applicant regarding potential changes to the specific location of the park-and-ride. While locations off the WCBR project property are being considered, these do not appear to be workable. It is anticipated that the park-and-ride lot will need to be accommodated on the WCBR project property. The applicant must coordinate with County and VDOT staff to identify a suitable location for the park-and-ride facility that is acceptable to both the County and VDOT. Staff appreciate the applicants' effort to help coordinate a meeting to discuss this topic soon.

Thirdly, interconnections to adjacent properties within the Development Area are required by County Code. Currently, the application plan does not appear to reserve any area in Block 5 in anticipation of future interconnection for Tax Map 78, Parcel 53 (see page 17 of the Pantops Master Plan). Staff requests that the application plan be revised to provide the opportunity for future interconnection of these areas. The application plan will also need to include a pedestrian connectivity plan to show where sidewalks and shared use paths are proposed.

Next Steps in the Application Process

The applicant and staff are actively working together to schedule the following meetings:

1. Meeting between the applicant, County, and VDOT to discuss the planned VDOT park-and-ride location.
2. Community Meeting required by Section 33.4 of County Code.
    i. A date in November and location TBD.
3. ARB work session
    i. Date TBD once a quorum of the ARB can be confirmed for a meeting date that is also acceptable to the applicant.
4. PC work session
    i. To occur on November 17th if community meeting occurs by November 9th (or earlier); OR
    ii. To occur on December 8th if community meeting occurs by November 16th.

Conclusion

These comments are preliminary and not exhaustive. Preliminary comments from each individual reviewer, based on information available to-date, can be found in Civic Access. Based on the feedback and outcomes of each of the meetings above, staff will issue a consolidated reviewer comment letter with a complete list of recommended revisions to the application plan, code of development, and narrative. Staff anticipate there may be new and different comments based on revisions made in response to the next steps in the application process listed above.

Action after Receipt of Comments

Upon receipt of this letter, please indicate whether the applicant will defer or if they seek to schedule a public hearing (refer to Section 33.11). If deferring, a resubmittal must be received within 6 months of the deferral request.

Resubmittal
If you choose to resubmit, please use the attached form. There is no fee for the first resubmittal.

Feel free to contact me if you wish to meet or need additional information. My email address is jnewberry2@albemarle.org.

Sincerely,



J.T. Newberry
Senior Planner II
Planning Division, Department of Community Development

Attachments: Comments from Office of Housing

Comments from Albemarle County, Office of Housing – Shaqual Rennolds, srennolds@albemarle.org

The proposed rezoning application has been reviewed for consistency with the County's housing policy.

Housing Albemarle establishes the objective of increasing the supply of housing to meet the diverse needs of both current and future residents. As part of that objective, the policy calls for a mixture of housing types, with a minimum of 20% of the total number of housing units in new developments provided as affordable housing. Furthermore, Housing Albemarle explicitly aims to increase the supply of affordable and accessible housing for seniors and persons with disabilities, particularly those with low and moderate incomes.

The applicant proposes rezoning and expanding the Westminster-Canterbury of the Blude Ridge (WCBR) campus, a continuing care retirement community (CCRC) that provides independent living, assisted living, memory care, and healthcare services. While the application acknowledges Housing Albemarle, the applicant requests an exemption from the County's affordable housing framework. The applicant contends that the affordable housing framework should not apply to the applicant's proposal because their CCRC model does not consist of traditional dwelling units for purchase or lease; instead, their CCRC model consists of residents entering into residency agreements that bundle housing with dining, programming, healthcare, and other on-site services.

Housing staff does not agree that the CCRC operating model, by itself, exempts the applicant's proposal from consideration under Housing Albemarle or, more specifically, its affordable housing framework.

This determination is based on the policy itself: Housing Albemarle defines a housing unit as a single residential unit providing complete, independent living facilities, including permanent provisions for living, sleeping, eating, cooking, and sanitation. Based on this definition, the applicant's proposed independent-living units appear to qualify as housing units and therefore warrant consideration in the evaluation of the project under Housing Albemarle. Therefore, the presences of independent-living units does not support the County excluding the proposal from consideration under current housing policy.

Housing staff acknowledge the applicant's description of its CCRC's residency model, and it raises additional considerations regarding how Housing Albemarle and its affordability framework may be best applied to the CCRC, or at minimum the independent-living component of the project. The applicant states that housing costs are bundled with dining, programming, healthcare, and other on-site services. Housing staff request additional information regarding the fee and cost structure associated with the proposed independent-living units. Housing staff asks that this request further include, to the fullest extent possible: (1) a breakdown of costs attributed to housing, (2) a breakdown of costs attributed to services and amenities. This information shall assist staff in determining how Housing Albemarle and its objectives, including affordability for low and moderate income seniors, maybe best addressed within the CCRC model.

Following review of the requested information, Housing staff shall be in a position to further discuss how the applicant can best align their proposal with Housing Albemarle and its affordability framework. Alignment with the housing policy and its affordability framework may include:

-- The provision of affordable independent-living units;

-- Cash-in-Lieu contribution consistent with County practices and standards, subject to staff review and Board approval;

-- OR another project-specific approach that advances Housing Albemarle and affordability for low and moderate income seniors.

In close, Housing staff asks that the applicant revise its application materials to provide the additional information requested above, and update the application narrative to address how the project can better align with Housing Albemarle.

Resubmittal of information for Zoning Map Amendment

PROJECT NUMBER THAT HAS BEEN ASSIGNED: ZMA-2026-00010 Westminster-Cantebury of the Blue Ridge

Owner/Applicant Must Read and Sign

I hereby certify that the information provided with this resubmittal is what has been requested from staff

Signature of Owner, Contract Purchaser

Date

Print Name

Daytime phone number of Signatory

FEES that may apply:

Resubmittal fees for original Zoning Map Amendment fee of $2,958		
☑	First resubmission	FREE
☐	Each additional resubmission **(TO BE PAID WHEN THE RESUBMISSION IS MADE TO INTAKE STAFF)**	$1,480
☐	Technology surcharge	+ 4%
☐	Preparing and mailing or delivering up to fifty (50) notices	$235 + actual cost of first-class postage

Most applications for a Zoning Map Amendment require at least one public hearing by the Planning Commission and one public hearing by the Board of Supervisors. Virginia State Code requires that notice for public hearings be made by publishing a legal advertisement in the newspaper and by mailing letters to adjacent property owners. Therefore, at least two fees for public notice are required before a Zoning Map Amendment may be heard by the Board of Supervisors. The total fee for public notice will be provided to the applicant after the final cost is determined and must be paid before the application is heard by a public body.

FOR OFFICE USE ONLY Fee Amount $_____ Date Paid_____ By who? _____

Receipt # _____ Ck#_____ By:_____

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