



C H A T H A M C O U N T Y - S A V A N N A H

METROPOLITAN PLANNING COMMISSION

"Planning the Future - Respecting the Past"

M E M O R A N D U M

DATE: October 7, 2025

TO: THE MAYOR AND ALDERMEN OF THE CITY OF SAVANNAH

FROM: METROPOLITAN PLANNING COMMISSION

SUBJECT: Text Amendment

PETITION REFERENCED:

Petitioners: Nancy Maia, Agent for Victorian Neighborhood Association, Jason Combs, Agent for Thomas Square Neighborhood Association, Bernadette Perry, Agent for Cuyler-Brownville Neighborhood Association

Petition File Number: 25-004589-ZA

MPC ACTION:

The Planning Commission recommends **approval** of the Petitioner's request to amend Article 7, Section 7.13, Hotel Development Overlay District, to extend application of the existing boundaries to include the Victorian, Streetcar and Cuyler-Brownville Historic Overlay Districts prohibiting 'hotel' development. (City Hotel Overlay Study Option 3)

MPC STAFF RECOMMENDATION:

MPC Staff recommends **denial** of the Petitioners' request.

Alternatively, MPC Staff recommends **approval** of Option 1 as identified within the City of Savannah Hotel Overlay Expansion Study with two (2) modifications detailed below. This option appropriately balances desired 'Traditional Business' corridor character with adequacy of infrastructure to support robust commercial activity, including hotel development.

1. MPC Staff recommends that the draft Sec. 8.4.36, Commercial Use Standards for Limited and Special Uses, be modified to eliminate the requirement that a proposed hotel/motel use be a mixed-use development.
2. In the interest of the continued restoration and of historic structures, MPC Staff recommends amendment of Sec. 5.4, Principal Use Table to reflect allowance for conversion of "contributing" and "historic" properties to 'small' hotels (16-40 rooms) within the expanded Overlay District through issuance of a Special Use Permit from City Council. Such conversions should be limited to structures originally built for multifamily or non-residential uses.

MEMBERS PRESENT: 9

Traci Amick
Laureen Boles
Travis Coles – Chairman
Michael Kaigler
Jay Melder
Jeff Notrica
Stephen Plunk
Coren Ross
Tom Woiwode – Vice Chair

PLANNING COMMISSION VOTE: Approve Petitioner's Request. (6-2)

APPROVAL Votes: 6	DENIAL Votes: 2	ABSENT	Abstain	Recused
Amick Boles Coles Kaigler Melder Ross	Plunk Woiwode	Ervin Jarrett Stephens Welch Wilson	Notrica	

Respectfully submitted,



Melanie Wilson
Executive Director and CEO

MW/sh

Enclosure

cc Mark Massey, Clerk of Council
Lester B. Johnson, Assistant City Attorney
Jennifer Herman, Assistant City Attorney
Bridget Lidy, Department of Inspections



CHATHAM COUNTY-SAVANNAH METROPOLITAN PLANNING COMMISSION

“Planning the Future, Respecting the Past”

Council Report

TO: City Council

FROM: Planning Commission

DATE: October 7, 2025

SUBJECT: Text Amendment to the City of Savannah Zoning Ordinance and Map Amendment to the Official Zoning Map

Re: Amendment to Section 7.13, Hotel Development Overlay District
Applicants: Nancy Maia, *Victorian Neighborhood Association*
Jason Combs, *Thomas Square Neighborhood Association*
Bernadette Perry, *Cuyler-Brownville Neighborhood Association*

MPC FILE NO: 25-004589-ZA – TEXT, 25-004592-ZA-MAP

REQUEST:

A Petition to amend Article 7, Section 7.13, Hotel Development Overlay District, to extend application of the existing boundaries to include the Victorian, Streetcar and Cuyler-Brownville Historic Overlay Districts prohibiting ‘hotel’ development.

The Ordinance text is proposed to be amended to read as follows:

RED = new for Victorian and Streetcar Amendment

BLUE = new for Cuyler-Brownville Amendment

7.13.1 Purpose

The intent of this overlay district is to establish standards to guide the size and location of future hotel development within the Savannah **Downtown** Historic District, **the Victorian Historic District**, **and the Streetcar Historic District**, **and the Cuyler-Brownville Historic District**.

The overlay district distinguishes hotel categories by large hotels (75 guest rooms or more) and small hotels (16-74 guest rooms) based on the Smith Travel Accommodations Report (STAR) program used by the global hotel industry. STAR benchmarks the performance of hotels in competitive markets. The local tourism industry uses STAR data to gauge market demand and plan accordingly.

7.13.2 Relationship to Zoning Districts

For all properties within the boundaries of the Hotel Development Overlay (“HDO”) District, the regulations for both the base zoning district and the overlay district shall apply. The HDO District determines if a hotel use is or is not a permitted use rather than the base zoning district. The HDO District does not eliminate or reduce any of the Historic District regulations established in Section 7.8. , 7.9 , 7.10 or 7.11

7.13.3 Applicability

a. The Hotel Development Overlay (“HDO”) District shall be identified on the official zoning map as “HDO”.

b. The boundaries of the HDO District shall be the same as the boundaries of the Savannah Downtown Historic District, combined with the Victorian Historic District, the Cuyler-Brownville Historic District, and the Streetcar Historic District, which are the area bounded on the north by the Savannah River; on the east by Randolph Street between the Savannah River and Broughton Street, and by East Broad Street between Broughton and Gwinnett Streets to the rear property lines between 40th Street and Maupas Avenue, ; on the south by Gwinnett Street; and on the west by West Boundary Street between the Savannah River and West Gwinnett Street, by May Street between West Gwinnett Street and West Anderson Street, by Martin Luther King Jr. Boulevard between West Anderson Street and Victory Drive, by Montgomery Street from Victory Drive to West 44th Street ; on the south by Victory Drive from Martin Luther King Jr. Boulevard to Montgomery Street, by West 44th Street from Montgomery Drive to Bull Street, again by Victory Drive from Bull Street to Price Street, and by the rear property lines between 40th Street and Maupas Avenue from Price Street to East Broad Street.

Please add to this the area encompassed by:

The boundaries of the Cuyler-Brownville Historic District shall follow the National Register Historic District boundaries with the addition of an area to the west of the district, and shall be the area bounded by the centerlines of the following streets and lanes: on the north by Anderson Street (including the historic Cuyler School property); on the south by Victory Drive; on the east by Martin Luther King, Jr. Boulevard; and on the west by Ogeechee Road to West 34th Street, Kollock Street from West 34th Street to Ogeechee Road, and Ogeechee Road from Kollock Street to Victory Drive (Fig. 7.10-1).

as illustrated in Figure 7.13-1

(see updated map)

(see further updated map)

7.13.5 Hotel Use Conditions

The below use conditions shall apply to new hotels. Variances from these conditions shall not be permitted.

a. New Hotels

i. Location

New hotels are permitted only within designated areas of the Historic Districts as shown on Figure 7.13-1 Location is based on street designation and the “small” or “large” hotel

classification.

ii. Frontage

New hotels must be located on a designated street as shown on [Figure 7.13-1](#).

iii. Conversion of Residential Structures Classified as Historic

Any single-family residential structure identified on the Historic Buildings Map **or Contributing Resources Map** for the Historic Districts cannot be converted to a hotel use. Single-family residential includes the following: detached, attached, semi-attached, semidetached, row, end-row, and accessory dwellings. This condition applies only to the areas designated as “Small Hotels Only” on [Figure 7.13-1](#).

b. Re-establishment of a Historic Hotel

An existing contributing building located within the Hotel Development Overlay District, that was constructed as a hotel within the Period of Significance, as defined in [Sec. 7.8.5](#), [Sec. 7.9.5](#), [Sec. 7.10.4](#), **or Sec. 7.11.5** and subsequently converted to another use, may be re-established as a hotel. Section 7.13.5 (a) criteria does not apply to the re-establishment of a historic hotel. In such case, the Planning Director, shall validate the prior historic use prior to the issuance of a Building Permit.

Figure 7.13-1 and the official zoning map are proposed to be amended as follows:



BACKGROUND:

Per City of Savannah Staff research, The Hotel Development Overlay District (HDO District) was established by the City Council in February 2018 in response to concerns over increasing hotel development in the Savannah Downtown Historic District, particularly with regards to impacts on residential areas and the possibility that hotel development may discourage new residential development. The overlay was based on recommendations from a 2017 Metropolitan Planning Commission study (“Impacts of Hotels in the Historic, Victorian and Mid-City Districts”), subsequent City zoning staff review, and stakeholder input. The consulted stakeholders included the Downtown Neighborhood Association, tourism and hotel industry leaders, Historic Savannah Foundation, and others.

The HDO District was incorporated into the NewZO, City’s new zoning ordinance, under Article 7.0 Section 7.13, effective September 1, 2019, to guide the size and location of future hotel development within the Savannah Downtown Historic District.

The HDO distinguishes two categories of hotels: large, having 75 guest rooms or more, and small, having 16-74 guest rooms. Establishments having 15 or fewer guest rooms The Overlay

The HDO is controlling with specific regard to establishment of hotel uses and supersedes the base zoning district in which the property is located.

- TC-1 and TC-2 – Traditional Commercial zoning districts:
 - Small hotels (16-74 rooms) may be permitted only when approved by the Mayor and Aldermen in accordance with the procedures of Sec. 3.10, Special Use Permit.
 - No use conditions exist for hotel under Article 8.
 - Large hotels are not permitted in TC zoning districts.
- OI-E – Office and Institutional–Expanded zoning district:
 - Large hotels (75 rooms or more) and small hotels (16-74 guest rooms) are permitted by right.
- Within the proposed expansion area, hotels are not permitted in Traditional Neighborhood (TN), Traditional Residential (TR), Neighborhood Business (B-N), or Conservation Preservation (C-P) zoning districts.
- In areas adjacent to the expansion area, hotels are not permitted in TN, TR, RSF, B-N, C-P, or I-L districts.

Special Use Permit review criteria (Sec. 3.10.8), which apply to new hotel developments in TC zoning districts, include the following:

- Consistency with the Comprehensive Plan and other adopted plans;
- Whether specific use standards, if any, in Article 8.0, Use Standards, can be achieved;
 - Currently, there are no use standards for hotel use under Sec. 8.4
- Impact on public interest, health, safety, welfare, function and appearance of adjacent

Source: Hotel Overlay Expansion Study - 2025

1. Victorian and Thomas Square Neighborhood associations originally applied May 18, 2023 (23-002724-ZA and 23-002729-ZA).
2. The Cuyler-Brownville Neighborhood Association was appended to the request on June 29, 2023 (23-003464-ZA).
3. Per the City Hotel Overlay Expansion Study, 653 parcels currently zoned TC-1, TC-2, and OI-E totaling 114 acres are impacted by the proposed HDO expansion.

Zoning District	TC-1		TC-2		OI-E		TOTAL	
	Parcels	Acreage	Parcels	Acreage	Parcels	Acreage	Parcels	Acreage
Victorian	51	8.23	79	19.1	2	6.31	132	33.64
Streetcar	392	58.24	70	14.72	0	0	462	72.96
Cuyler-Brownville	37	4.21	22	3.61	0	0	59	7.82
TOTAL	480	70.68	171	37.43	2	6.31	653	114.42

ORDINANCE ANALYSIS:

Per section 3.7.7 of Article 3, Savannah’s Zoning Ordinance offers four (4) review criteria for consideration of proposed text amendments:

- a. **Consistency** – The extent to which the proposed text amendment is consistent with the remainder of the Zoning Ordinance, including any purpose and intent statements.

MPC Staff Comment: *The proposed text amendment could be seen as conflicting with the standards established in Article 5 regarding the purpose and intent for base zoning districts with their attending permissible uses. Each zoning district is purposefully constructed to create a desirable character based on its development context with an ideal mixture of cohesive land uses that support and enhance the area both functionally and aesthetically. While zoning overlays are often used to help a community address a specifically identified concern, their use for the regulation or prohibition of a particular land use warrants caution to avoid the appearance of bias or discrimination. Where a particular base zoning district has identified a given use as appropriate, and an overlay prohibits establishment of the use, a clear public-interest rationale should be articulated.*

- b. **New or Changing Circumstances** – The extent to which the proposed text amendment represents a new idea not considered in the existing Zoning Ordinance, or represents a revision necessitated by changing circumstances over time.

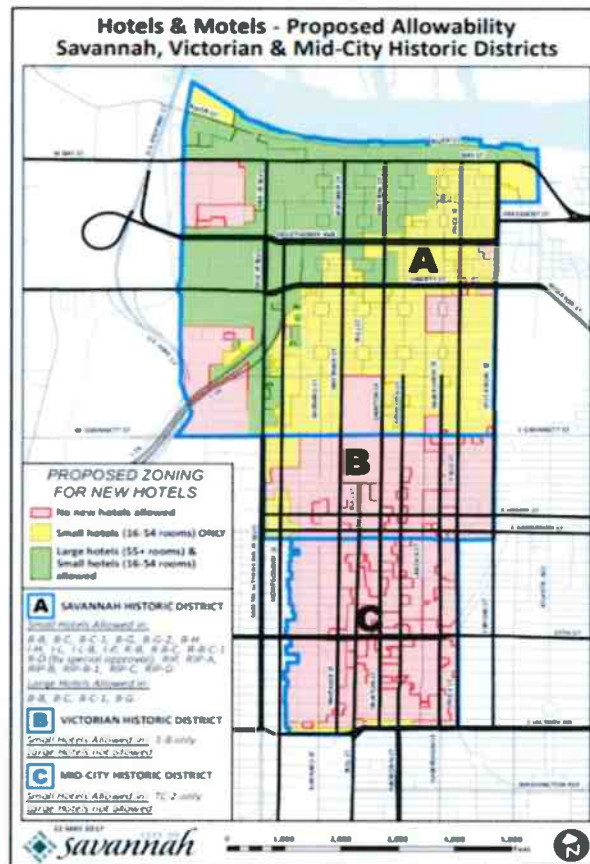
MPC Staff Comment: *The proposed amendment represents the extension and application of an existing Ordinance provision. The request is a response to the current rapidly changing real estate market surrounding Downtown Savannah. Development pressure has created a volatile market, and the Petitioner’s stated intent is to protect the identified character of the named Historic Districts from unplanned and potentially inconsistent development.*

- c. **Error or Inappropriate Standard** – Whether or not the proposed text amendment corrects an error in the Zoning Ordinance, or otherwise improves upon existing requirements or standards.

MPC Staff Comment: *The proposed amendment does not correct any error or improve upon existing requirements or standards in the Zoning Ordinance. The expansion of this provision (HDO) was previously anticipated to cover the Victorian and Streetcar historic districts (2017), but development pressure in the Downtown Historic District was perceived as the principal concern and other districts were excluded from the Overlay. It*

is now requested for expansion to preclude the perceived threat of hotel and tourist-zone expansion.

2017 MPC Study Map – Proposed Zoning for New Hotels



Victorian Historic District:

- small hotels (16-54 rooms) allowed in 3-B (now TC-2) only;
- large hotels (55+ rooms) not allowed

Mid-City Historic District:

- small hotels allowed in TC-2 only;
- large hotels not allowed

Per the Ordinance, the Victorian, Streetcar and Cuyler-Brownville Historic Overlays were adopted for the preservation and propagation of distinct development characteristics that are associated not only with a particular architectural style but also an appropriate scale of development. A request to place restrictions on the location and configuration of potentially large structures such as hotels within the these protected Districts is consistent with the preservation efforts for which they were established.

- d. **Compliance with Higher Law** – Whether or not the proposed text amendment revises the Zoning Ordinance to comply with state or federal statutes.

MPC Staff Comment: *The proposed amendment is not a revision to bring a local ordinance into conformance with state or federal law.*

POLICY ANALYSIS:

As the primary feature of the Hotel Development Overlay is its ability to dictate locations for the establishment of a ‘hotel’ use, the requested Zoning Ordinance amendment is effectively a request to halt all new hotel development within the Victorian, Streetcar, and Cuyler-Brownville Overlay districts. If adopted as requested, this language will extend the boundaries of the existing overlay, identifying no land or frontage as appropriate for hotel development within these areas. Establishing a new hotel within the named Districts would require one or more subsequent map amendments.

In the affected TC-1 and TC-2 zoning districts, currently, a Special Use Permit (SUP) granted by City Council is required to establish a hotel (16 or more rooms). In consideration of an SUP, Boards are directed to use the criteria identified in section 3.10.8 of *New ZO* in making a determination. These include: the potential impact of the use on health, safety, welfare, function and appearance of the general vicinity, the adequacy of the size and shape of the proposed parcel for the development, adequacy of public infrastructure and services, and impact to any resources of natural, cultural or historic importance. Following its analysis, City Staff has provided additional standards to be considered in the course of a SUP review that are likely to enhance the compatibility of a proposed hotel with its surroundings.

‘Inns,’ a less intense form of commercial lodging establishment defined as having up to 15 guest rooms, are ‘limited uses’ with the minimum requirements that they have 24/7 onsite staff and frontage on an arterial or collector. Inns, however, are not referenced or limited in the current or proposed Hotel Development Overlay District. Historic and any other development standards applicable to parcels within the affected Districts remain unaffected by the potential application of the HDO.

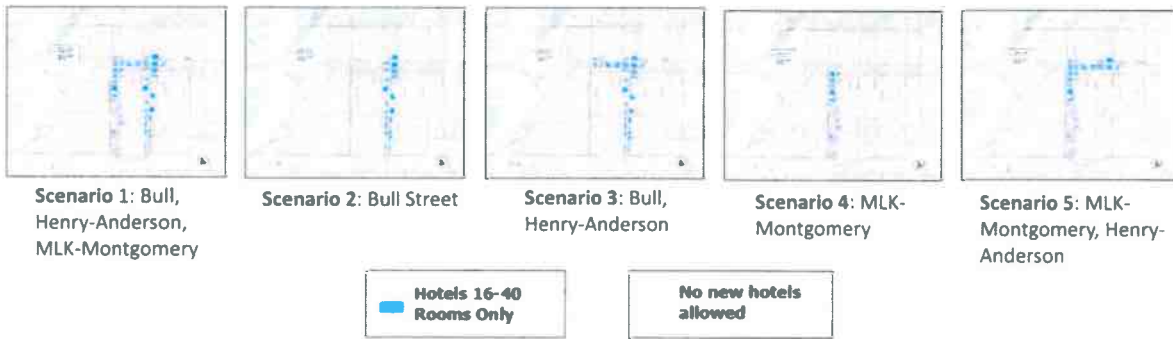
Overlay districts, generally, are adopted to preserve, enhance, guide or restrict development. However, this tool would typically be adopted as a means of addressing a targeted issue or implementing policies conceived through a neighborhood, district or corridor Plan, developed through an inclusive and informed planning process. *This request is not linked with the furtherance of any particular area or corridor plan.*

Following continuance of the Petition by the Planning Commission in 2023, the City of Savannah engaged relevant stakeholders and undertook study of the 3 Districts proposed for expansion, evaluating factors such as current zoning and use standards, availability of land for development, road network, and known development proposals. The result was a series of five (5) potential overlay scenarios based on current zoning and thoroughfare adjacency that lay a foundation for neighborhood-scale corridor plans or area plans which could justifiably function as the basis for targeted policies to implement a desired neighborhood form and character. In the course of stakeholder meetings, however, all such scenarios were rejected by neighborhood leadership in favor of the results of resident surveys calling for total prohibition of hotel development.

Stakeholder Meeting – Jan 2024

- **What we discussed:**

- Expanded Hotel Overlay: Optional permitted location scenarios



The results were condensed into three scenarios: one largely reflecting the existing zoning with a new 40-room (boutique) hotel classification and enhanced development standards, a second reflecting boutique hotel allowance on selected parcels fronting Henry and Anderson Streets between Whitaker and Drayton Streets, and a third reflecting the current resident-led petition.

In review, MPC Staff finds the Petitioners' request is based upon several assumptions for which quantified empirical justification is likely necessary before adoption of a total prohibition on a singular use is enacted as requested.

Among these assumptions are that:

- 1) Inappropriate hotel development is an imminent threat within the identified districts;
- 2) Prohibition of hotels would result in greater focus on housing for long-term residents and resident-centric business activity within the identified Districts;
- 3) Other non-hotel land uses are not a threat to the preservation of residential or historic character;
- 4) Current regulations and legislative process fail to adequately protect the integrity of the Historic Districts and/or residential character.

The present effort and its supporting survey and study represent a zoning exercise aimed at evaluating options for the modification of regulations addressing where and how hotels, within the scope and meaning of the Ordinance, are sited. It is not a comprehensive land use study or substantive economic analysis of the effects of hotels or other lodging establishments on patterns of land use or neighborhood character and composition.

RECOMMENDATION:

The Planning Commission recommends **approval** of the Petitioner's request to amend Article 7, Section 7.13, Hotel Development Overlay District, to extend application of the existing boundaries to include the Victorian, Streetcar and Cuyler-Brownville Historic Overlay Districts prohibiting 'hotel' development. (City Hotel Overlay Study Option 3)