# **Hotel Overlay Expansion Study, July 2025**

# **Background**

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.

Proposal to Expand the Overlay - 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. In July 2023, the Victorian, Thomas Square, and Cuyler-Brownville neighborhood associations submitted zoning petitions to the Metropolitan Planning Commission to expand application of the overlay to the Streetcar, Victorian, and Cuyler-Brownville Historic Districts. The goals of the petitions were to prevent developments that would negatively impact neighborhood quality of life, keep property within an affordable range, encourage residential infill, and provide a means for rigorous public review. At its July 25, 2023 meeting, the Planning Commission continued the petitions to allow for additional public notice and review. The City Manager initiated this study to ensure a diverse group of stakeholders were engaged in the process.

**Stakeholder Engagement** - In September 2023, the City's Planning and Urban Design Department initiated a study and stakeholder discussions to inform recommendations for an expanded hotel overlay. Participating stakeholders included representatives of the Thomas Square, Victorian, Cuyler-Brownville and Downtown neighborhood associations, Tourism Leadership Council, Savannah Area Chamber, Downtown Business Association, Historic Savannah Foundation, Forsyth Park Alliance, Housing Authority of Savannah, and Metropolitan Planning Commission.

The following report outlines the history, goals and purpose of the current hotel overlay; the proposal to expand the overlay; existing conditions and standards for hotel use; and recommendations for reducing land use conflicts between hotels and residential uses in the Streetcar, Victorian, and Cuyler-Brownville Historic Districts and adjacent neighborhoods.

**Recommendations** – The recommendations outlined beginning on page 18 were developed as a result of stakeholder discussions held between September 2023 and February 2025, supporting information presented in this report, and feedback from a follow-up survey issued by the three neighborhood associations in February 2024. Amendments are proposed to the following sections of the zoning ordinance: Section 7.13 Hotel Development Overlay District, Section 8.4 Commercial Use Standards for Limited and Special Uses, and Section 5.4 Principal Use Table.

Included in the Appendix are an inventory of existing and planned hotels, street classification table, and the February 2024 neighborhood survey executive summary.

# HISTORY, GOALS AND PURPOSE OF THE EXISTING HOTEL DEVELOPMENT OVERLAY DISTRICT

The Hotel Development Overlay (HDO) District was developed over the course of 15 months beginning with a directive issued by City Council in October 2016 to study the impacts of rapid hotel growth on residential neighborhoods and culminating with the adoption of the overlay in February 2018. The HDO was incorporated into the City's new zoning ordinance (NewZO) 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. In addition to addressing hotel development, measures were put in place through separate zoning amendments to incentivize infill and large-scale residential development in the downtown area. The HDO was amended in August 2022 to allow the re-establishment of a historic hotel as a hotel use, and in September 2024 to expand the Hotel Development Overlay District to permit hotel development on parcels adjoining Cohen Street.

The table below outlines the steps taken to develop the current HDO. Links to further details are provided.

Table 1: De	velopment of the Hotel Development Overlay District (Article 7 Section 7.13)
Oct 2016	City Council directed staff to assess impacts of hotels on downtown neighborhoods and recommend measures to limit additional hotel development. <a href="https://savannahgovtv.viebit.com/player.php?hash=xE89J020Q9j1">https://savannahgovtv.viebit.com/player.php?hash=xE89J020Q9j1</a>
Feb-Apr 2017	MPC completed a study, "Impacts of Hotels in the Historic, Victorian and Mid-City Districts."  City staff met with stakeholders and prepared alternative recommendations. A copy of the study and staff recommendations are provided in the appendix.
Apr 2017	City Council imposed a 90-day stay on new hotel development applications.  https://agenda.savannahga.gov/publishing/april-13th-city-council-meeting/motion-to-approve-resolution-imposing-a-temporary-delay-on-applications-to-develop-certain-hotels.html
Jun 2017	The City petitioned Planning Commission to amend ZO to redefine hotel categories, change permitted zoning districts, add use conditions, change bonus story and off-street parking requirements. Planning Commission denied petition, citing need for additional work and stakeholder outreach. <a href="mailto:june-6-2017-regular-mpc-meeting-minutes.pdf">june-6-2017-regular-mpc-meeting-minutes.pdf</a> (thempc.org)
Jun-Jul 2017	City staff met with stakeholders to determine where hotels would be allowed and max. size of hotels in certain areas.
Aug 2017	City Council referred proposed amendments back to MPC for further analysis and recommendation. <u>Agenda Plus</u> - August 3, 2017 City Council Regular Meeting (savannahga.gov)
Oct 2017	Planning Commission approved City's zoning petition to remove residential density requirements within the Savannah Downtown Historic District. The intent was to incentivize infill and large-scale residential development in the downtown area. 74 1186.pdf (thempc.org)
Nov 2017	City Council approved zoning text amendment to eliminate residential density requirements for Downtown Historic District. Agenda Plus - November 21, 2017 City Council Regular Meeting (savannahga.gov)
Jan 2018	Planning Commission recommended approval of HDO District and related amendments. <u>january-12-2018-special-called-mpc-meeting-minutes.pdf</u> (thempc.org)
Feb 2018	City Council approved establishment of HDO District and related amendments.  https://agenda.savannahga.gov/publishing/february-1-2018-city-council-regular-meeting/minutes.html
Sept 2019	HDO District and related amendments incorporated into zoning ordinance (NewZO) under Article 7 Section 7.13.
Aug 2022	City Council approved amendment ( <u>File No. 22-002694-ZA</u> ) allowing re-establishment of a historic hotel as a hotel use ( <u>Article 7 Section 7.13.5.b</u> ).
Sept 2024	City Council approved an amendment (File No. 24-000558-ZA) to expand the Hotel Development Overlay District to permit hotel development on parcels adjoining Cohen Street (Article 7, Section 7.13, Figure 7.13-1).

# MPC 2017 Study, Impacts of Hotels in the Historic, Victorian and Mid-City Districts

The Metropolitan Planning Commission study, Impacts of Hotels in the Historic, Victorian and Mid-City Districts (February 2017), identified how hotels were regulated under the (previous) zoning ordinance, including identification of zoning districts where hotels were permitted, applicable use conditions, off-street parking requirements, local historic district design review requirements, and review procedures. The study also identified ordinances and policies that encouraged hotel development over other uses, particularly residential. Recommendations focused on creating a hotel size distinction, limiting incentives that were attracting large-scale hotel development (e.g., parking, entrances, bonus stories), and creating incentives to attract residential development.

The study covered the Savannah Downtown Historic District, Victorian Historic District, and Mid-City (now Streetcar) Historic District. In addition to recommendations aimed at reducing incentives for hotel development, the study recommended size thresholds, based on City of Charleston standards, and permitted locations for hotels, as shown in Figure 1.

Only the recommendations for the Savannah Downtown Historic District were carried forward, amended, and codified; the Victorian and Mid-City districts were not included in the final Hotel Development Overlay District due to

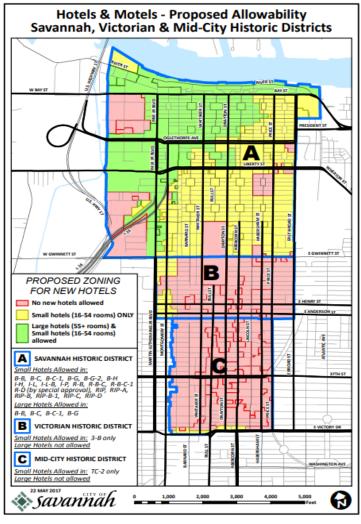


Figure 1: 2017 MPC Study Map, "Proposed Zoning for New Hotels"

development pressures within the Downtown Historic District. Recommendations for these other two districts were as follows:

- 1. Victorian Historic District:
  - small hotels (16-54 rooms) allowed in 3-B (now TC-2) only;
  - large hotels (55+ rooms) not allowed
- 2. Mid-City Historic District:
  - small hotels allowed in TC-2 only;
  - large hotels not allowed

A copy of the 2017 MPC study is included in the Appendix.

# **CURRENT HOTEL DEVELOPMENT OVERLAY DISTRICT (ARTICLE 7 SEC. 7.13)**

New hotels in the Savannah Downtown Historic District are subject to the provisions of the Hotel Development Overlay (HDO) District (Article 7 Sec. 7.13), which sets out standards to guide the size and location of future hotel development within the Savannah Historic District.

The HDO District distinguishes hotel categories by large hotels (75 guest rooms or more) and small hotels (16-74 guest rooms). As shown in Figure 2, new hotels are permitted only within certain areas of the Savannah Historic District based on street designation and the "small" or "large" hotel classification. New motels are not a permitted use within the HDO District.

New hotels must front a designated street. Streets where hotels are permitted include Fahm Street, Ann Street, Martin Luther King, Jr. Blvd, Montomery Street, Whitaker Street (north of Liberty), Drayton Street (portions), Abercorn Street (Bay to Oglethorpe, River Street, Indian Street, Bay Street, Bryan Street (west of Lincoln), Broughton Street, Zubly Street, Oglethorpe Ave. (portions), Turner Blvd., Louisville Road, Liberty Street (portions), Jones Street (west of MLK), and Cohen Street.

The ordinance also prohibits the conversion of a historic single family residential structure to a hotel

use. In August 2022, the zoning ordinance was amended to permit the re-establishment of a previously operating hotel, classified as a contributing building within the HDO District, under certain conditions.

#### **Relationship to Zoning Districts**

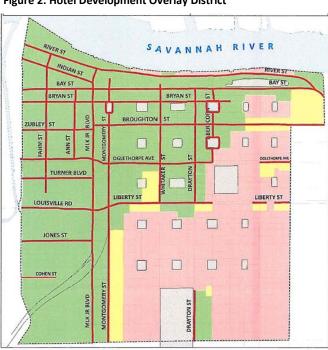
For all properties within the boundaries of the Hotel Development Overlay ("HDO") District, the regulations for both the base zoning district and the overlay district apply. It is the HDO District, however, rather than the base zoning district, that determines if a hotel use is or is not a permitted use.

Hotel developments within the HDO District must also comply with development standards for permitted uses (Sec. <u>5.14.5</u>), general site standards (<u>Article 9</u>), and the <u>Savannah Downtown Historic Overlay District standards (Sec. 7.8) of the zoning ordinance.</u>





Figure 2: Hotel Development Overlay District



<sup>&</sup>lt;sup>1</sup> Hotel size categories are based on the Smith Travel Research (STR) thresholds used by the global hotel industry.

<sup>&</sup>lt;sup>2</sup> A motel is a lodging establishment where guest rooms have their own door to the exterior of the building.

# **Current Hotel Inventory in the Downtown Area**

As of October 2023, there were 32 large hotels (including one under construction) with a total of 5,694 rooms and 17 small hotels, including one under construction, with a total of 563 rooms, in the downtown Savannah area.<sup>3</sup> The total number of rooms currently available or under construction downtown is 6,257. In addition, there are six hotels (four large and two small) currently under review, which would add another 698 rooms to the downtown hotel capacity. Four new hotel permits have been issued since the HDO District was approved by City Council in 2018.

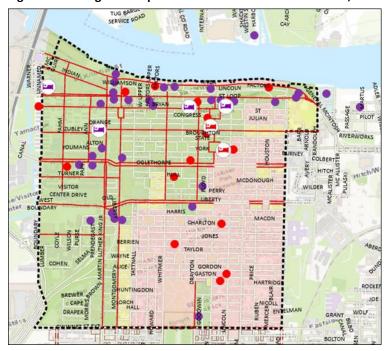
Table 2: Downtown Area Hotels as of December 2024

	Existing	Under Const. In Review		Total
Small (16-74 rooms)	16	1	3	20
# Rooms	527	36	152	715
Large (75 + rooms)	32	2	7	41
# Rooms	5,536	379	1026	6941
Total Hotels	48	3	10	61
Total Rooms	6,063	415	1,178	7,656

In addition to the hotels shown in Table 2, new hotels on the horizon in the downtown area include the Hunter Maclean building at 200 E. Saint Julian Street (~73 rooms), the Savannah Convention Center Hotel, Hutchinson Island (~400 rooms), 3 MLK Hotel at 3 MLK, Jr. Blvd. and 512 Indian Street (95 rooms), and 123 W. Oglethorpe Ave. (17 rooms).

Currently, there are no hotels existing or in the planning stages in the Victorian, Streetcar or Cuyler-Brownville historic districts.

Figure 3: Existing and Proposed Hotels in the Downtown Area, Oct. 2023





<sup>&</sup>lt;sup>3</sup> Savannah Downtown Historic District, Hutchinson Island, and Eastern Wharf.

#### PROPOSAL TO EXPAND THE HOTEL DEVELOPMENT OVERLAY DISTRICT

In July 2023, the Thomas Square, Victorian, and Cuyler-Brownville neighborhood associations filed petitions with the City to amend Article 7 Section 7.13, Hotel Development Overlay District, to extend the existing HDO District boundary beyond the Savannah Downtown Historic District to include the Victorian, Streetcar, and Cuyler-Brownville historic districts.

In requesting the HDO boundary extension, the petitioners sought to prevent developments that would negatively impact neighborhood quality of life, help maintain affordability, encourage residential infill, particularly multi-family, and provide a means for rigorous public review.

As displayed in Figure 4, the petitions showed the three historic districts proposed for inclusion in the HDO District shaded in pink, signifying 'No New Hotels Allowed,' per the existing HDO District map legend. Additionally, no streets were identified as appropriate for hotel development.

Surveys and signature sheets collected by the neighborhood associations showed strong support for the HDO District extension among residents, business owners, and visitors to the area. A joint letter submitted by the Tourism Leadership Council, Savannah Area Chamber,



Figure 4: Proposed Expansion of Hotel Development Overlay District

Downtown Business Association and SEDA, however, requested broader stakeholder engagement and collaboration before a decision on the petitions was rendered. As a result, the Planning Commission voted at its July 25, 2023 meeting to continue the petitions to allow for additional public notice and review. The City Manager provided an opportunity for a diverse stakeholder group to collaborate with the City on proposed recommendations. The petitions, MPC staff reports, letters of support and opposition, neighborhood surveys, and other supporting documents can be found here: 5839 32602.pdf (thempc.org) and 5840 32598.pdf (thempc.org).

# **Existing Conditions**

**Victorian Historic District** - The Victorian Historic District includes the East and West Victorian neighborhoods, Dixon Park, and the Kayton/Frazier area. The majority of properties in the Victorian district are zoned TN-1 — Traditional Neighborhood, including residential and mixed-use developments east and west of Forsyth Park as well as Simon Frazier Homes, which extends along Martin Luther King, Jr. Blvd. from W. Anderson Street to Gwinnett Street. Owned by the Housing Authority of Savannah, Simon Frazier Homes is a 236-unit public housing development covering almost 17 acres.

Properties zoned TC-1 – Traditional Commercial are located in small clusters on collector streets including Abercorn, Habersham and E. Broad streets, along the Henry-Anderson corridor, and along Montgomery Street south of W. Duffy Street. Properties zoned TC-2 are concentrated along the MLK, Jr. Blvd.-

Montgomery Street corridor, Bull Street south of Forsyth Park, and the area surrounding the Kroger on E. Gwinnett Street. Two parcels on the western end of the Victorian District are zoned OI-E – Office and Institutional – Expanded.

**Streetcar Historic District** – The Streetcar Historic District encompasses the Thomas Square and Metropolitan neighborhoods and portions of the Bingville, Baldwin Park, and Midtown neighborhoods. The district is characterized by a mix of small lot single- and two-family residential, multi-family residential, commercial and institutional uses. TN-2 – Traditional Neighborhood is the predominant zoning district, intended primarily for residential uses, but also allowing limited nonresidential uses compatible with the residential character of the neighborhoods.

Properties zoned TC-1 – Traditional Commercial make up more than 20% of total parcels in the Streetcar Historic District. They are concentrated primarily along Bull Street but are also prevalent throughout the Thomas Square neighborhood and Starland area. Properties zoned TC-2 are located along the MLK, Jr. Blvd – Montgomery Street corridor and Victory Drive.

**Cuyler Brownville Historic District** - Cuyler-Brownville is a residential community featuring single and multiple family residences, attached row houses, small commercial establishments, and community landmark buildings. The majority of properties are zoned TR-1 and TR-3 – Traditional Residential.

TC-1 zoning districts are found primarily along Martin Luther King, Jr. Blvd and in a one-block area of 37<sup>th</sup> Street between Harden and Florance Streets. Properties zoned TC-2 are limited to two areas along Martin Luther King, Jr. Blvd.—between W. 39<sup>th</sup> and W. 40<sup>th</sup> streets and between W. 32<sup>nd</sup> and Anderson streets. Other parcels within the Cuyler-Brownville district are zoned TN-1—Traditional Neighborhood, B-N — Neighborhood Business, PD — Planned Development, and C-P — Conservation-Park.

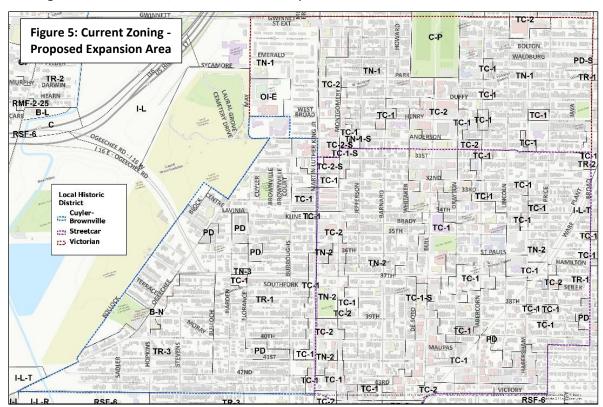


Table 3: Zoning District Definitions (for Hotel Overlay Expansion Area)

P. N. Noighborhood Business	The P. N. district is established to permit small scale, neighborhood eriented persocidential uses
B-N-Neighborhood Business	The B-N district is established to permit small-scale, neighborhood-oriented nonresidential uses and upper story residences. This district is intended to provide for limited commercial opportunities in a walkable environment and to reduce or prevent impacts on adjacent or nearby residential uses. Uses in this district are intended to be located primarily on collector or arterial streets within convenient traveling distance from neighborhoods which they will serve.
C-P-Conservation-Park	The Conservation-Park ("C-P") district is established to preserve and enhance parkland as permanent open space to meet the active and passive recreational needs of residents and to also protect cultural and historic resources. Permitted uses are limited to parks and recreation, cemeteries and other uses that promote open space and preservation of resources.
OI-E—Office and Institutional— Expanded	The Office and Institutional-Expanded ("OI-E") district is established to allow office uses as well as limited residential, group living, health care, educational, cultural, lodging and service uses. The OI-E district is intended to serve a transition district between the more intensive Nonresidential districts and less intensive districts.
PD—Planned Development	The Planned Development (PD) district allows projects that would not otherwise be permitted under this Ordinance because of the strict application of zoning district development standards or general site standards. Generally, the PD district is intended for sites where a developer proposes and the Mayor and Aldermen desire to achieve a certain mix of uses, appearance, land use compatibility and/or apply special sensitivity to the character of the site surrounding area. In return for greater flexibility in site design requirements, planned developments are expected to deliver innovative and exceptional quality community designs that preserve environmental, historic and cultural resources; incorporate creative design in the layout of buildings, open space and vehicular and pedestrian circulation; assure compatibility with surrounding land uses and area character; and, provide greater efficiency in the layout and provision of roads, utilities and other infrastructure that would not otherwise be possible within a base zoning district.
TC-1–Traditional Commercial	The TC-1 district is established to ensure the vibrancy of historic mixed use neighborhoods with traditional development patterns characteristic of Savannah during the streetcar and early automobile eras. The district provides for commercial areas that are developed at a mass and scale harmonious with nearby residential neighborhoods.
TC-2–Traditional Commercial	The TC-2 district is established to ensure the vibrancy of historic mixed use neighborhoods with traditional development patterns characteristic of Savannah during the streetcar and early automobile eras. The district provides for the creation of commercial corridors along higher classifications of streets that traverse historic neighborhoods.
TN-1–Traditional Neighborhood	The TN-1 district is intended to ensure the vibrancy of historic residential neighborhoods with traditional development patterns characteristic of Savannah from approximately 1890 to 1920 during the streetcar era. While the district provides for primarily residential uses, it also includes limited non-residential uses that are considered compatible with the residential character of the neighborhood. The TN-1 district is intended for use only within the Victorian Historic Overlay District.
TN-2–Traditional Neighborhood	The TN-2 district is intended to ensure the vibrancy of historic residential neighborhoods with traditional development patterns characteristic of Savannah from approximately 1890 to 1930 during the streetcar and early automobile eras. While the district provides for primarily residential uses, it also includes limited nonresidential uses that were historically deemed compatible with the residential character of neighborhoods, including corner stores and midblock ground floor office uses. The TN-2 district is intended for use only within the Streetcar Historic Overlay District.
TR-1–Traditional Residential	Residential development in the TR-1 district allows for a variety of housing types including single-family detached, single-family attached, two-family over/under and three-four family. This district may be applied only to the following neighborhoods: Benjamin Van Clark Park, Cuyler-Brownville, Eastside and Midtown.
TR-3—Traditional Residential	Residential development in the TR-3 district allows for single family detached residences. This district may be applied only to the following neighborhoods: Benjamin Van Clark Park, Cann Park, Cuyler-Brownville, Jackson Park and Live Oak.

# Current Zoning and Development Standards for Hotel Use in Proposed HDO Expansion Area

As shown in the Principal Use Table in Figure 6 below, hotels<sup>4</sup> are currently permitted in the Victorian, Streetcar and Cuyler-Brownville historic districts as follows:

- 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.
  - Only two parcels within the study area are zoned OI-E. These parcels are currently occupied by the West Broad Street YMCA at 1110 May Street and the EOA for Savannah-Chatham County, Inc. Head Start Program (Elementary School) at 1120 May Street.
- Within the proposed expansion area, hotels are <u>not</u> 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 <u>not</u> permitted in TN, TR, RSF, B-N, C-P, or I-L districts.

**Principal Use Table** ✓ = Permitted Use L= Limited Use S=Special Use Blank Cell = Use not permitted TN-2 MMMM PRINCIPAL USES N C C С н Cor. Int. -1 -2 -1 -3 -2 R N C В Lot Lot D Hotel/motel, 16-74 s s Sec. 7.13 Hotel/motel, 75 or Sec. 7.13 more rooms

Figure 6: Principal Use Table (Section 5.4)

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 uses or general vicinity;
- Adequacy of size and shape of proposed parcel, public infrastructure and services; and
- Impact to resources of natural, cultural or historic importance.

<sup>&</sup>lt;sup>4</sup> Hotel, Motel: A lodging establishment for transient guests with more than 15 guest rooms. Any on-premises use that is accessible by the general public, such as a restaurant, bar or event/assembly space, is a separate principal use and must be an allowed use in the base zoning district. Any on-premises use that is accessible only by hotel quests is an accessory use.

#### **Development Standards**

In addition to meeting the criteria for a Special Use Permit, new hotel developments in the proposed HDO expansion area must also comply with the following development and site standards:

- Development Standards for Permitted Uses (Sec. 5.13.5)
- General Site Standards (Article 9.0)
- Local Historic Overlay District Standards (Sections 7.9, 7.10, and 7.11)

**Development Standards for Permitted Uses** (Sec. 5.13.5) – These standards apply to lot size, setbacks, building coverage, building footprint, and building height. Most relevant to the hotel use, the maximum building footprint allowed is 5,500 square feet in TC-1 districts and 10,000 square feet in TC-2 districts. In both TC-1 and TC-2 districts, the maximum height is three stories up to 45 feet. Sec. 5.13.8 of these standards allows a building footprint to exceed the maximum allowed in TC-2 districts if approved as a Special Exception under Sec. 3.12, Special Exceptions.

Local Historic Overlay District Standards — Within the proposed HDO expansion area, new hotel developments are subject to historic district standards for the Victorian Historic Overlay District (Sec. 7.9), Cuyler-Brownville Historic Overlay District (Sec. 7.10), and Streetcar Historic Overlay District (Sec. 7.11). These standards govern the issuance of Certificates of Appropriateness (COA) by the Historic Preservation Commission, which must meet the following: Secretary of Interior's Standards and Guidelines for Rehabilitation, visual compatibility criteria, historic district design standards, relocation standards, demolition standards, sign standards, and additional regulations applicable to Martin Luther King, Jr. Blvd. and Montgomery Street, including TC-2 development standards for density and height.

The historic district standards do <u>not</u> apply to TC zoning districts outside of the proposed HDO expansion area.

**General Site Standards** (Article 9.0) – These standards apply to access management and connectivity, off-street parking and loading, screening and buffers, fences and walls, outdoor storage areas, lighting, and signs.

Off-street parking requirements (Sec. 9.3.4) specify one vehicle parking space per guest room for new hotel developments. For hotel developments within the proposed HDO expansion area, however, the Victorian and Streetcar Parking District standards (Sec. 9.3.7) apply. Tailored to the mix of land uses and availability of alternative modes of transportation in this area, the district parking standards allow for a reduction in the number of off-street parking spaces required by Sec. 9.3.4. The general site standards also allow for alternative parking plans to meet off-street parking requirements, such as remote parking, shared parking, and valet parking.

Any on-premises uses associated with a hotel development that are open to the public, such as a restaurant, bar, or event space is considered a separate use and would need to separately comply with the development, site, and historic district standards.

# TC – Traditional Commercial Zoning Districts

The framework for the Traditional Commercial (TC) zoning districts was established in the *Thomas Square Streetcar Historic District Land Use and Zoning Study*, adopted in 2005. This plan led to the establishment of the Mid-City (now Streetcar) Historic District. It also established the conceptual zoning district structure for Downtown Savannah and other historic neighborhoods (e.g., D-R, D-X, T-N and T-R), much of which was incorporated into the City's zoning ordinance during development of the NewZO.

Hotels were not permitted in TC-1 districts when the Traditional Commercial zoning districts were originally established; the hotel/motel use was, however, established as a permitted use in TC-2 districts. The hotel/motel use was added later—allowing small hotels only—as a special use, in TC-1 districts during the development of the NewZO. In both cases, these traditional commercial zoning districts were intended to be governed by neighborhood design standards, which are now incorporated into the local historic district design standards.

**Developable Sites** - TC-1 has a maximum footprint for nonresidential buildings of 5,500 square feet; TC-2 has a maximum footprint of 10,000 square feet.<sup>5</sup> That means the bottom floor of the building cannot be larger than 5,500 square feet in TC-1 districts or 10,000 square feet in TC-2 districts. With a three-story height limit in these zoning districts, the combined floor area would be limited to 16,500 square feet in TC-1 districts and 30,000 square feet in TC-2 districts. The size of the site would likely be driven mostly by the need for parking.

As shown in Table 3, the average building footprint of existing small hotels (16-74 rooms) in the downtown area is just over 3,600 square feet, with a range of 1,694-13,390 square feet. The average parcel size for small hotels is around 6,830 square feet; parcel sizes range from 1,775 to 20,893 square feet.<sup>6</sup>

Table 4: Building Footprint and Parcel Size of Existing Small Hotels

_	Range (sq. ft.)	Average (sq. ft.)			
<b>Building Footprint</b>	1,694-13,390	3,635			
Parcel Size	1,775-20,893	6,829			

Vacant and non-vacant parcels within the study area that are 5,500 square feet or larger are shown on the map in Figure 7. There are currently 69 vacant parcels 5,500 square feet or larger in the study area. When combined with adjacent vacant parcels, this number rises to 87. Other factors potentially affecting hotel development, including non-contributing buildings and street classification, are also shown. Currently, there are 97 non-contributing buildings in the study area: 51 in the Victorian district, 33 in the Streetcar district, and 13 in Cuyler-Brownville. Non-contributing buildings are not protected by demolition standards and have fewer procedural requirements/challenges for redevelopment.

Because arterials are higher capacity streets that carry traffic between centers of activity and do not typically penetrate neighborhoods, they are considered more desirable for developers and more appropriate locations for commercial uses such as hotels. Major arterials in the study area include portions of 37th Street and Victory Drive; minor arterials include portions of Anderson Street, Bull Street, Drayton Street, Gwinnett Street, Henry Street, MLK, Jr. Blvd., Montgomery Street, Ogeechee Road, Price Street and Whitaker Street.

<sup>&</sup>lt;sup>5</sup> Sec. 5.13.8, Development Standards for Permitted Uses, allows a building footprint to exceed the maximum allowed in TC-2 districts if approved as a Special Exception under <u>Sec. 3.12</u>, Special Exceptions.

<sup>&</sup>lt;sup>6</sup> The building footprint average excludes the Marshall House, and the parcel size average excludes the Thunderbird Inn. Each of these properties far exceeds other small downtown hotels in footprint and parcel size, respectively.

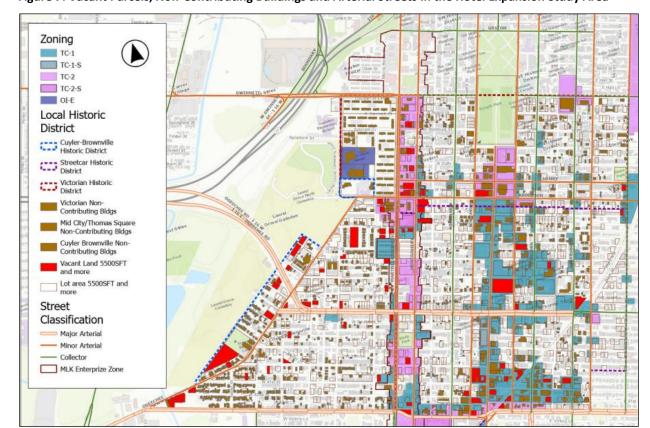


Figure 7: Vacant Parcels, Non-Contributing Buildings and Arterial Streets in the Hotel Expansion Study Area

# Parcels Affected by the Proposed Hotel Overlay Expansion

Properties currently zoned TC-1, TC-2 and OI-E within the Victorian, Streetcar and Cuyler-Brownville historic districts would be affected by the proposed HDO expansion (653 parcels covering 114 acres). A breakdown by historic district is shown in the table below. Affected parcels are highlighted in yellow on the map in Figure 8.<sup>7</sup>

Zoning District	TC-1		Т	C-2	C	I-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

<sup>&</sup>lt;sup>7</sup> The property located at 112 E. Henry Street was rezoned from TN-2 to TC-1 in December 2024 and is not included in the table above or the map in Figure 8. This 0.14-acre parcel, which lies in the Victorian District, brings the total number of affected parcels to 654.

D-R TN-1 VICTORIAN THOMAS 144 CUYLER-BROWNVILLE THIS MAP IS A COMPILATION OF INFORMATION FROM VARIOUS SOURCES AND SCALES. IN MOST CASES THE INFORMATION HAS NOT BEEN FIELD VERIFIED. USE THIS MAP FOR GENERAL PLANNING PURPOSES ONLY. 1 inch = 1,100 feet

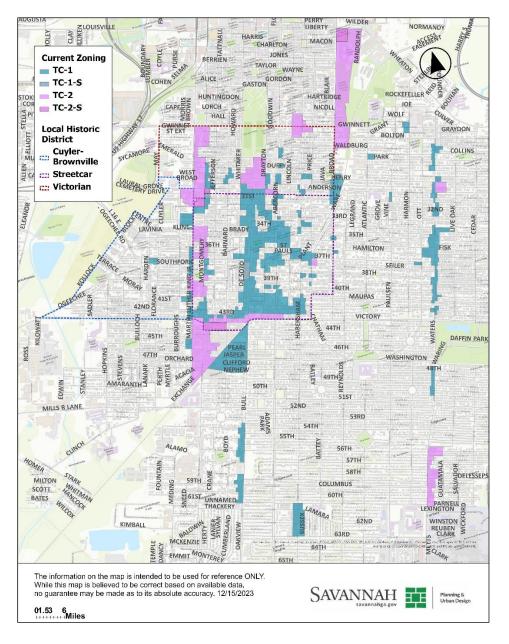
Figure 8: Affected Parcels in the Proposed HDO Expansion Area

# TRADITIONAL COMMERCIAL (TC) ZONING DISTRICTS OUTSIDE OF PROPOSED OVERLAY EXPANSION AREA

As shown on the map in Figure 9, TC-1 and TC-2 zoning districts also exist in neighborhoods outside of the proposed HDO expansion area: south of Victory Drive between Bull Street and Martin Luther King, Jr. Blvd. and along portions of E. Broad Street, Waters Avenue, Bull Street, and Habersham Street. Any changes to permitted uses and use standards for hotels in TC districts resulting from this effort would also apply to TC districts outside of the overlay expansion area.

While zoning districts within the proposed HDO District expansion area are subject to local historic district design standards, TC districts outside of the expansion area are not governed by such standards. In addition to preserving historic resources through demolition protection, these design standards help ensure that new construction, alterations and additions are visually compatible with existing resources within each district.

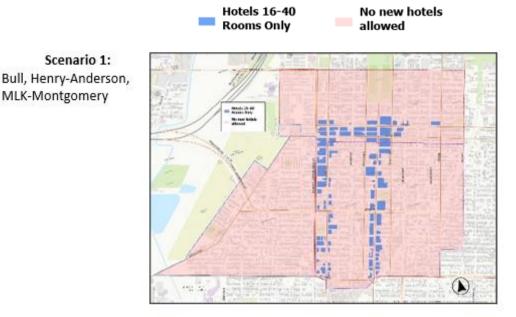
Figure 9: TC – Traditional Commercial Zoning Districts (Citywide)



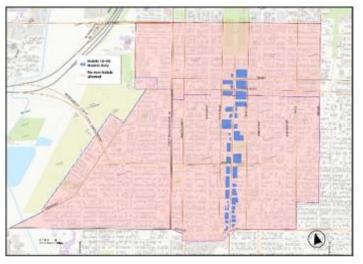
#### STAKEHOLDER DISCUSSIONS

During discussions held between September 2023 and January 2024, the stakeholder group explored the establishment of a smaller hotel size (16-40 rooms) that could potentially be permitted in TC-1 and TC-2 zoning districts within designated areas of the Victorian, Streetcar, and Cuyler-Brownville Historic Districts as part of an expanded overlay. Several designated location scenarios were studied, including the Bull Street, Henry-Anderson, and MLK-Montgomery corridors. Stakeholders also looked at recommended changes to the commercial use standards applicable to the hotel/motel use as a means of reducing impacts of hotel development on the character, integrity, and quality of life in these historic neighborhoods.

Figure 10: Optional hotel location scenarios discussed by stakeholders, January 2025



Scenario 2: Bull Street



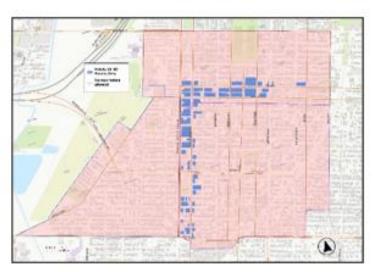
Scenario 3: Bull, Henry-Anderson



Scenario 4: MLK-Montgomery

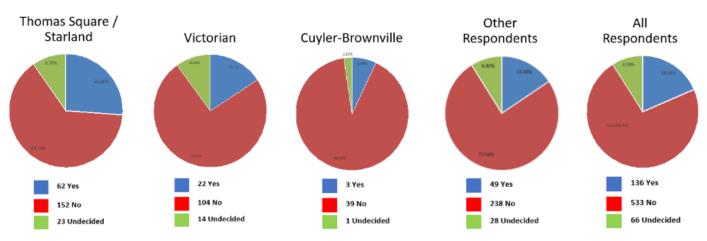


Scenario 5: MLK-Montgomery, Henry-Anderson

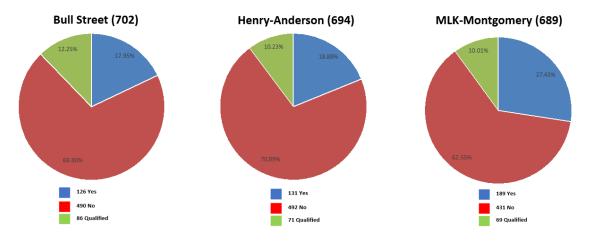


In February 2024, the Victorian, Thomas Square, and Cuyler-Brownville neighborhood associations issued a follow-up survey to gauge support of the proposed 40-room hotel size and designated location scenarios. More than 700 responses were received from neighborhood residents, businesses, and interested stakeholders from outside the three neighborhoods. Although responses varied across the three neighborhoods and by corridor, the survey results showed widespread opposition to even smaller-scaled hotels with 40 rooms or less. (A copy of the survey and summary of responses are included in the appendix.)

# General Support for 40-room hotels by Neighborhood



# Support by Corridor – All Respondents



In a meeting with City staff in December 2024, the neighborhood leadership stated that, as a result of the survey feedback, they intended to move forward with their original petition to expand application of the hotel development overlay to the Victorian, Streetcar, and Cuyler-Brownville Historic Districts without any amendments to the commercial use standards applicable to the hotel/motel use.

In February 2025, staff met with stakeholders to review the survey results and discuss the neighborhoods' preference to exclude any hotels from the proposed overlay. During the meeting, a tourism representative proposed the option of allowing small hotels (40 rooms or less) on properties facing Henry and Anderson streets between Whitaker and Drayton streets. As shown in Figure 11, this area encompasses parcels including the former Sears Building and parking lot, BellSouth/AT&T Building, St. Paul's Greek Orthodox Church, Bull Street Baptist, and SCAD. All of these parcels are designated as Traditional Commercial on the Future Land Use Map (FLUM) and are zoned TC-2 —except for one parcel—which is zoned TC-1.

This proposal was reviewed by staff and presented to the neighborhood for feedback. The Victorian Neighborhood Association (VNA) leadership opposed this option.

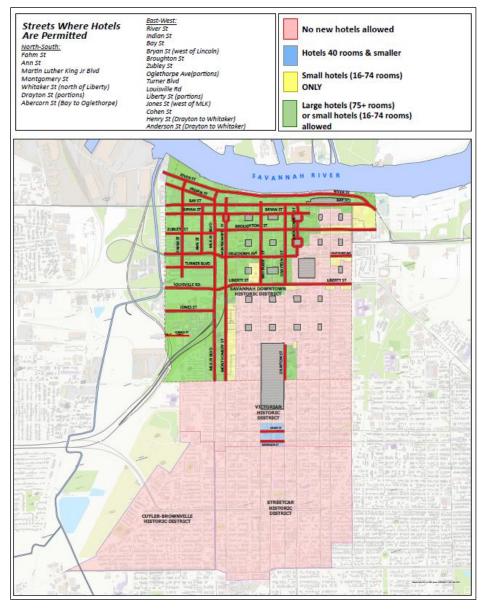


Figure 11: Optional overlay allowing small hotels on parcels facing Henry and Anderson streets between Whitaker and Drayton.

As an alternative, staff suggested limiting the area where small hotels would be allowed to two parcels along Henry and Anderson streets between Bull and Drayton (see Figure 12). The VNA also opposed this alternative, but expressed openness to adding special use conditions for hotel use within TC (Traditional Commercial) districts.

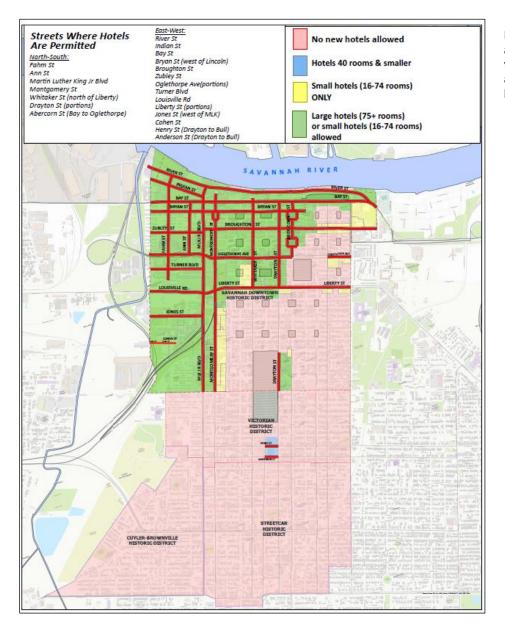


Figure 12: Optional overlay allowing small hotels on two parcels along Henry and Anderson streets between Bull and Drayton.

#### RECOMMENDATIONS

The recommendations listed below were developed as a result of stakeholder discussions held between September 2023 and February 2025, feedback from neighborhood surveys, and supporting information presented in this study. Amendments are proposed to the following sections of the zoning ordinance:

- 1. **Section 7.13 Hotel Development Overlay (HDO) District** Expand the existing hotel development overlay to encompass the Victorian, Streetcar, and Cuyler-Brownville historic districts.
  - **Option 1:** Within the expanded HDO District, hotels with 40 rooms or less would be permitted as a Special Use in all TC-1 and TC-2 (Traditional Commercial) zoning districts.
  - **Option 2:** Within the expanded HDO District, hotels with 40 rooms or less would be permitted as a Special Use in designated areas limited to properties facing Anderson and Henry streets between Whitaker and Drayton streets. All of these parcels are zoned TC-2, except for one parcel, which is zoned TC-1.
  - Option 3: Within the expanded HDO District, no hotels would be permitted.
- 2. **Section 8.4 Commercial Use Standards for Limited and Special Uses** Add use conditions to provide the necessary tools to ensure responsible development that aligns with the needs and concerns of the community. Use conditions would apply to all three options listed above.

### Section 8.4.36 Hotel/motel:

- Within any TC district, the following standards would apply to the hotel/motel use:
  - Such use shall be limited in size to 16 to 40 rooms.
  - Such use shall be part of a mixed-use development.
  - Such use must provide 24 hours, 7 days a week onsite staff to assist guests with lodging services.
  - Reductions in screening and buffering as required by Sec. 9.5 shall not be varied.
  - Reductions in design standards for mechanical equipment and refuse as required by Sec. 7.9.10, 7.10.10, and 7.11.10 shall not be varied.
  - The developer shall submit to the Jurisdiction an affidavit stating that any outdoor pool proposed as part of the hotel development shall be accessed by hotel guests only.
  - The building footprint of a proposed hotel development may not exceed the maximum allowed by Sec. 5.13.5, Development Standards for Permitted Uses, and shall not be varied.

3. **Section 5.4 Principal Use Table** – Amend the Principal Use Table to include reference to use conditions applicable to the hotel use (Sec. 8.4.36).

Principal Use Table												
✓ = Permitted Use; S=Special Use; Blank Cell = Use not permitted												
PRINCIPAL USES	TC-1	TC-2	D-N	D-C	D-CBD	D-X	D-W	OI-E	В-С	В-М	IL-T	Use Standards
Hotel/motel, 16-74 rooms	S	S	<b>√</b>	✓	<b>√</b>	✓	✓	<b>✓</b>	✓	S	✓	Sec. 7.13 <u>and</u> <u>Sec. 8.4.36</u>
Hotel/motel, 75 or more rooms			S	S	✓	✓	✓	✓	✓		✓	Sec. 7.13