

Interoffice Memorandum

DATE: April 21, 2025

TO: Mayor Jerry L. Demings and County Commissioners

THROUGH: N/A

FROM: Tanya Wilson, AICP, Director Planning, Environmental, and Development Services Department

CONTACT: James Resta, AICP, Chief Planner, Comprehensive Planning

PHONE: (407) 836-5624

DIVISION: Planning Division

ACTION REQUESTED:

Make a finding of consistency with the Comprehensive Plan and ADOPT Staff-Initiated Text and Map Amendment 2024-2-B-CP-1 and ADOPT the associated Ordinance. District 1.

PROJECT: Amendment 2024-2-B-CP-1 – Kilgore Road Rural Residential Enclave

PURPOSE: Amendment 2024-2-B-CP-1 (Kilgore Road Rural Residential Enclave) is a staff-initiated text and map amendment to the Future Land Use Element and Future Land Use Map Series of the Comprehensive Plan, to amend existing policies to create the Kilgore Road Rural Residential Enclave and add Map 25(f), to the Future Land Use Map Series.

The Planning and Zoning Commission (PZC) / Local Planning Agency (LPA) hearing was held on March 20, 2025. The amendment was recommended unanimously for adoption. This amendment was continued by the Board from April 22, 2025, to May 6, 2025.

BUDGET: N/A



The following meetings and hearings have been held:			Project Information	
Report/Public Hearing		Outcome	Title: Staff-Initiated Text and Map Amendment 2024-2-B-CP-1, Kilgore Road Rural Residential Enclave	
✓	Kilgore Road neighborhood community meetings were held July 25, 2024, November 13, 2024, and December 18, 2024.	Residents expressed support for establishing a Rural Residential Enclave for the Kilgore Road neighborhood.	Division: Planning	
✓	Staff Report	Recommend Transmittal		
✓	LPA Transmittal January 16, 2025	Recommended Transmittal (6-0)	Request: This request proposes to establish the Kilgore Road Rural Residential Enclave. Rural Residential Enclaves recognize and protect existing rural neighborhoods within or in close proximity to the Urban Service Area from suburban development pressure. There are currently five designated Rural Residential Enclaves. This amendment would designate the portion of the Kilgore Road neighborhood within the Urban Service Area as an additional Rural Residential Enclave, amend the Rural Residential Enclave policies of the Comprehensive Plan to establish a minimum 2.0-acre net developable land area requirement for the new Rural Residential Enclave, add Kilgore Road as an identified Rural Residential Corridor, and update the Zoning and Future Land Use Correlation Table.	
✓	BCC Transmittal February 11, 2025	Transmit (6-0)		
✓	State Comments March 14, 2025	Staff received no comments on or objections to the proposed amendment.		
✓	LPA Adoption March 20, 2025	Recommend Adoption (6-0)	Revision: Future Land Use Element Policies FLU2.5.2, FLU2.5.4, and FLU8.1.1 Addition: Map 25(f) of the Future Land Use Map Series, Kilgore Road Rural Residential Enclave	
	BCC Adoption	May 6, 2025		

STAFF RECOMMENDATION

Staff recommends that the Board of County Commissioners make a finding of consistency with the Comprehensive Plan, determine that the proposed amendment is in compliance, and **ADOPT** Staff-Initiated Text and Map Amendment 2024-2-B-CP-1 establishing the Kilgore Road Rural Residential Enclave.

LOCAL PLANNING AGENCY RECOMMENDATION AND BOARD OF COUNTY

COMMISSIONERS ACTION

On January 16, 2025, the Local Planning Agency (LPA) recommended **TRANSMITTAL** of proposed **Amendment 2024-2-B-CP-1**, establishing the Kilgore Road Rural Residential Enclave. On February 11, 2025, after public input and discussion, the Board of County Commissioners (BCC) agreed with the LPA's recommendation and **TRANSMITTED** Amendment **2024-2-B-CP-1** for state and regional agency review.

In their comment letter dated March 14, 2025, the Florida Department of Commerce stated that it had no comments on the proposed amendment. **Amendment 2024-2-B-CP-1** returned for its adoption public hearing before the LPA on March 20, 2025. After public input and discussion, the LPA recommended **ADOPTION** of the proposed amendment. **Amendment 2024-2-B-CP-1** is scheduled for its adoption public hearing before the BCC on May 6, 2025.

ANALYSIS

1. Background

Orange County is at the center of a highly dynamic region that has become one of the world's leading destinations since the 1970s. Over that period, many rural or semi-rural neighborhoods have transitioned into urban or suburban neighborhoods, while others have maintained their historic rural development patterns.

Some of these rural neighborhoods are located within or in close proximity to the Orange County Urban Service Area (USA) boundary and can be considered as "**Rural Residential Enclaves**". They are characterized as single-family neighborhoods with a homogenous and stable pattern of development, fairly defined geographic boundaries, and very low residential densities that are commonly associated with rural settings.

In 2015 and at the request of several members of the Orange County Board of County Commissioners (BCC), Orange County staff began a Small Area Study for four neighborhoods in unincorporated Orange County that have relatively low densities of residential development, have retained a rural or agricultural character and development pattern, and have inconsistencies between the zoning of the area and the applicable Future Land Use Map designation.

In 2018, Rural Residential Enclaves were first established to recognize and protect these existing rural neighborhoods from suburban development pressure that is otherwise encouraged by the County's existing development framework and urban infill policies. The amendment adopted by Ordinance No.

2018-17 designated the boundaries for three Rural Residential Enclaves (Lake Mabel, Berry Dease, and Chickasaw), established minimum lot sizes and other development guidelines, and updated the Zoning and Future Land Use Correlation Table. Later that year, Ordinance No. 2018-23 established the Rocking Horse Road Rural Residential Enclave, and in 2023, Ordinance No. 2023-04 established the Orlando-Kissimmee Farms Rural Residential Enclave.

The adopted policies establish a definition of Rural Residential Enclaves, thus providing guidance to elected officials, staff, and residents. They also outline the requirements of the designation and state that the creation of new Rural Residential Enclaves must be initiated by the BCC or by County staff in coordination with the BCC, with notice to and participation from property owners and local residents.

The Kilgore Road neighborhood is located along Kilgore Road, Darlene Drive, and Charles E. Limpus Road, just west of S Apopka Vineland Road in District 1. Most lots west of Kilgore Road and northwest of Charles E. Limpus Road have direct access to either Lake Sheen or Pocket Lake. While the majority of the neighborhood falls within the County's Urban Service Area (USA), existing single-family lots generally range in size from 1 to 2 acres with very deep front yard setbacks. As commonly seen in rural communities, Kilgore Road, Darlene Drive, and Charles E. Limpus Road have narrow cross-sections with grass shoulders and limited lane striping. These roads also rely on drainage swales due to the absence of curb-and-gutter systems. With only a few exceptions, existing single-family homes are dependent upon private septic systems and potable water wells.

Much of the Kilgore Road neighborhood falls within the USA and has an existing Low Density Residential (LDR) Future Land Use Map (FLUM) designation, with a maximum allowable density of 4 dwelling units per net acre. Portions of lots that have direct access to Lake Sheen or Pocket Lake, or lots along Charles E. Limpus Road, have a Rural/Agricultural (R) FLUM designation, with a maximum allowable density of 1 dwelling unit per 10 net developable acres, and are not located in the USA.

The majority of the greater Kilgore Road neighborhood is currently zoned R-CE (Country Estate District), which requires a minimum 1-acre lot size for any proposed lot split application. A limited number of parcels closer to the Kilgore Road and S Apopka Vineland Road intersection are zoned PD (Planned Development District). Immediately east of the Kilgore Road neighborhood are two adjacent suburban, single-family subdivisions that are solely accessed from S Apopka Vineland Road and are zoned R-1AA (Single-Family Dwelling District), which permits a minimum lot size of 10,000 square feet. None of the PD- or R-1AA-zoned properties are included in the proposed Kilgore Road Rural Residential Enclave boundary.

Kilgore Road Neighborhood Community Meetings

A community meeting was held on July 25, 2023, with the Kilgore Road neighborhood regarding the proposed Vision 2050 Comprehensive Plan update and the County's proposed form-based zoning code, Orange Code. Most Kilgore Road neighborhood residents and property owners were unaware of their current LDR FLUM designation and location within the USA. After learning about the maximum residential density considered under the current LDR FLUM designation and the proposed Vision 2050 Suburban Neighborhood (SN) Place Type/FLUM designation, attendees expressed concern about potential new development and rezoning applications. After expressing their skepticism that such applications would

be denied by the County, attendees asked if any guarantees could be provided. Some residents also asked how the proposed Vision 2050 Comprehensive Plan and Orange Code would benefit them if it included no further protections from intrusive development applications.

Attendees were far more concerned about the possibility of future development applications in the Kilgore Road neighborhood and less about the proposed Vision 2050 FLUM designations and Orange Code zoning districts. Despite having a better understanding of the proposed density within the proposed Vision 2050 Suburban Neighborhood (SN) Place Type designation and the continued large-lot development standards within the proposed Orange Code T2.1 and T3.1 transect zones, residents still voiced their skepticism that the new plan and code would provide long-term protections.

Aware of the County's Rural Residential Enclave provisions in the Comprehensive Plan, one resident asked if this designation could be applied to the Kilgore Road neighborhood to provide greater protection from potential lot split and development applications. Planning Division staff then proceeded to explain the purpose and intent of a Rural Residential Enclave designation for the benefit of those who were unfamiliar. Based in part on the input received during the July 25 community meeting, District 1 Commissioner Nicole Wilson prepared and submitted a Commissioner's Report to the Mayor and Board outlining the need to designate the Kilgore Road neighborhood as a Rural Residential Enclave. During a subsequent Board meeting on August 13, 2024, the topic was formally discussed by the Board, and direction was given to staff to initiate the amendment process.

The first of two community meetings solely related to the proposed Kilgore Road Rural Residential Enclave was held on November 13, 2024, at Bay Meadows Elementary School. The meeting was attended by 32 residents and property owners. During this meeting, staff outlined the purpose of Rural Residential Enclaves and began assessing residents' sentiments for applying this designation to the Kilgore Road neighborhood.

The second and final Kilgore Road Rural Residential Enclave-related community meeting was held on December 18, 2024, at the Orange County Sportsmen's Association. This meeting was attended by 97 residents and property owners. Building on the information and insight obtained from residents during the first meeting, the primary objective of this engagement was to build community consensus on both the boundary of the proposed Kilgore Road Rural Residential Enclave and the desired minimum lot size within it. Residents were also assured that any existing and legally created lots with less acreage than the minimum net developable lot area for new development under the intended Kilgore Road Rural Residential Enclave provisions would remain buildable, subject to underlying zoning standards. The meeting concluded with clear community consensus for a minimum net developable land area of 2.0 acres and with an enclave boundary that only included land within the USA and with direct access to Kilgore Road.

Figure 1 provides an aerial view of the proposed Kilgore Road Rural Residential Enclave with the USA boundary shown. **Figure 2** depicts the currently-adopted Future Land Use designation of the proposed Kilgore Road Rural Residential Enclave, and **Figure 3** illustrates the present zoning classification.

Figure 1, Aerial Map



Figure 2, Future Land Use Map

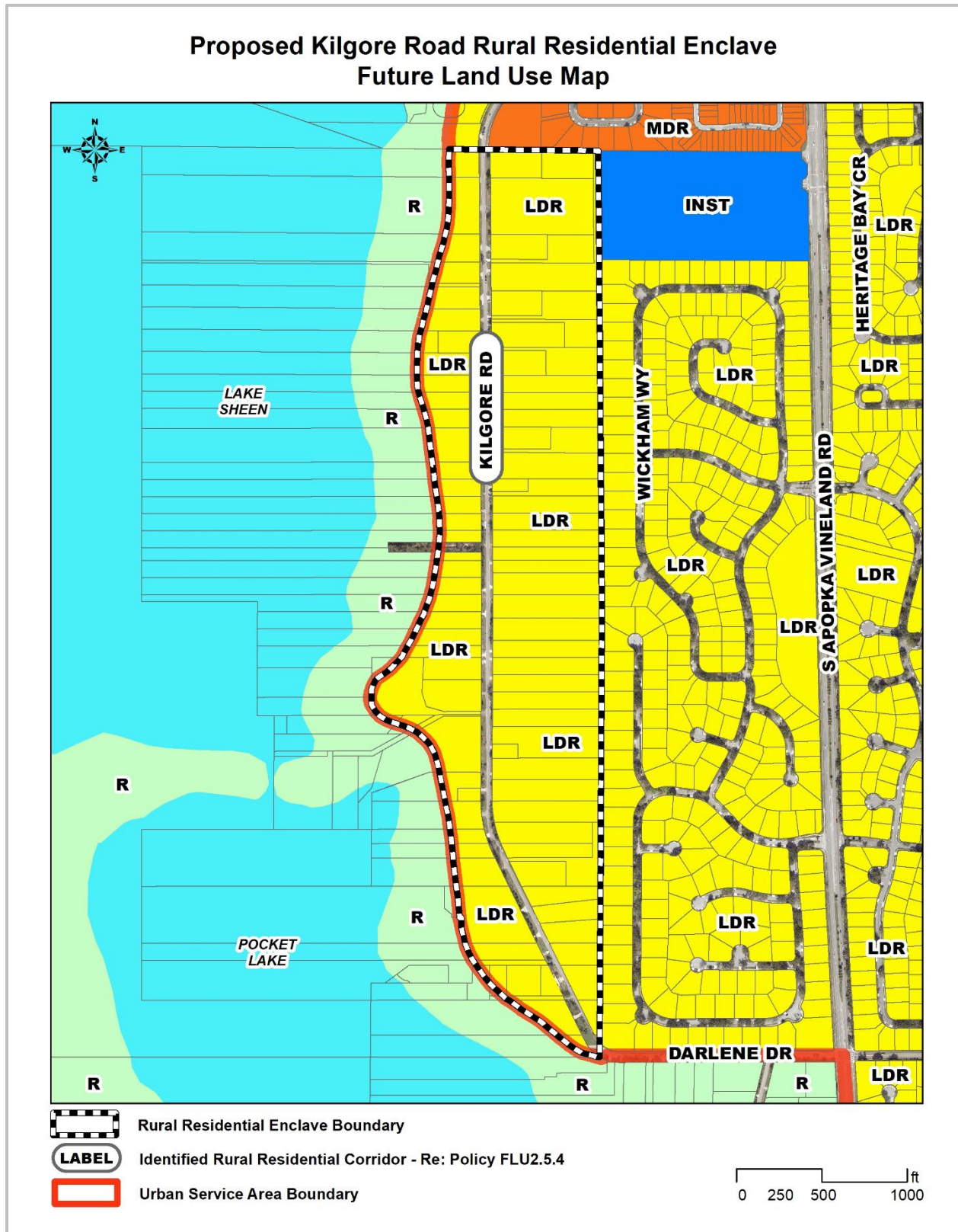
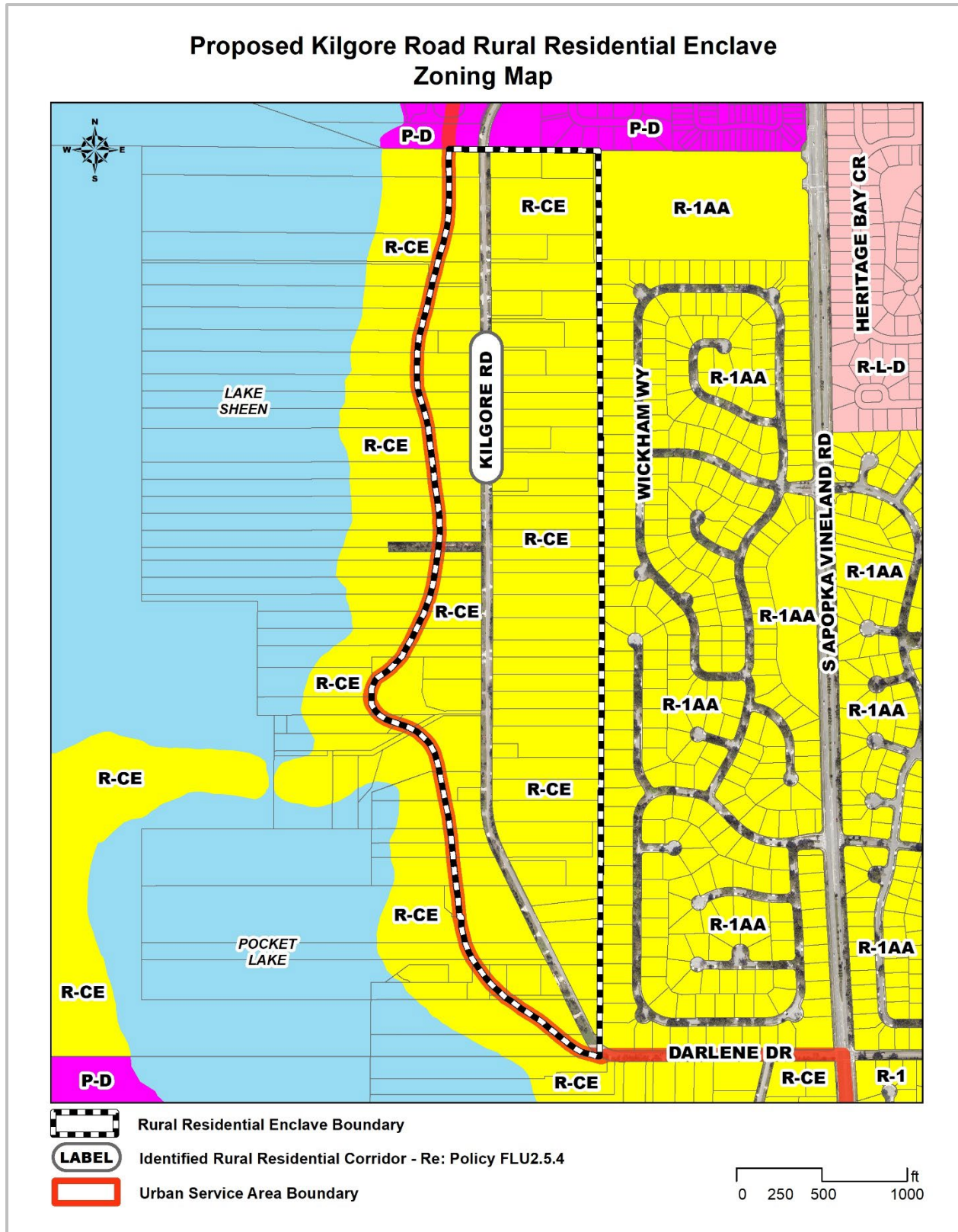


Figure 3, Zoning



2. Amendment Analysis

If approved, the proposed amendment would make the following changes to Future Land Use Element Policies FLU2.5.2 and FLU2.5.4—including under Objective FLU2.5, Rural Residential Enclaves—and Policy FLU8.1.1, containing the Zoning and Future Land Use Correlation Table. Approval of this requested amendment would also add Map 25(f), Kilgore Road Rural Residential Enclave, to the Future Land Use Map Series.

- Amends Policy FLU2.5.2, adding a new (f) establishing the Kilgore Road Rural Residential Enclave and correcting a scrivener's error through the addition of an (e) prior to new (f) reflecting the previous adoption of the Orlando-Kissimmee Farms Rural Residential Enclave by Ordinance No. 2023-04 to maintain internal consistency with Policy FLU2.5.4.
- Amends Policy FLU2.5.4 to add the new (f) establishing a 2.0-acre minimum net developable land area requirement for the Kilgore Road Rural Residential Enclave and adding Kilgore Road as an identified Rural Residential Corridor along which the existing rural design guidelines for Rural Residential Enclaves will apply.
- Makes corresponding changes to Policy FLU8.1.1, updating the text of the Zoning and Future Land Use Correlation Table pertaining to Rural Residential Enclaves for consistency.
- Amends the Future Land Use Map Series to include Map 25(f), establishing the portion of the Kilgore Road neighborhood within the Urban Service Area as a Rural Residential Enclave (**Figure 4**).

3. Amendments to Rural Residential Enclave Policies

Listed below are the revised policies proposed through this amendment and the new proposed Map 25(f) of the Future Land Use Map Series creating the Kilgore Road Rural Residential Enclave.

Affected language is shown in underline/~~striketrough~~ format, with asterisks (***) representing breaks between unchanged policies.

FLU2.5.2 The following Rural Residential Enclaves are hereby established, with boundaries defined on Maps 25(a) through 25(~~d~~)(f) of the Future Land Use Map Series:

- a) Lake Mabel Rural Residential Enclave
- b) Berry Dease Rural Residential Enclave
- c) Chickasaw Rural Residential Enclave
- d) Rocking Horse Rural Residential Enclave
- e) Orlando-Kissimmee Farms Rural Residential Enclave
- f) Kilgore Road Rural Residential Enclave
(Added 8-31-18, Ord. 2018-17; Amended 5-4-21, Ord. 2018-23)

FLU2.5.4 Properties within Rural Residential Enclaves shall be subject to the minimum net developable land area* requirements and corridor guidelines as specified below, and as depicted on Maps 25(a) through 25(~~e~~)(f) of the Future Land Use Map Series.

<i>Rural Residential Enclave</i>	<i>Minimum Net Developable Land Area Requirement</i>	<i>Identified Rural Residential Corridors</i>	<i>FLU Map Reference</i>
<i>Lake Mabel</i>	<i>1.0 Ac. Min.</i>	<i>None</i>	<i>25(a)</i>
<i>Berry Dease</i>	<i>2.0 Ac. Min.</i>	<i>Berry Dease Road Sunderson Road Gregory Road</i>	<i>25(b)</i>
<i>Chickasaw</i>	<i>1.0 Ac. Min</i>	<i>S. Chickasaw Trail Chickasaw Farms Lane</i>	<i>25(c)</i>
<i>Rocking Horse</i>	<i>2.0 Ac. Min</i>	<i>Rocking Horse Road Tamanaco Trail Koi Road</i>	<i>25(d)</i>
<i>Orlando-Kissimmee Farms</i>	<i>2.0 Ac. Min</i>	<i>New Hope Road Beth Road Whispering Pines Road Happy Lane Bicky Road Seth Road Hidden Trail</i>	<i>25(e)</i>
<u><i>Kilgore Road</i></u>	<u><i>2.0 Ac. Min</i></u>	<u><i>Kilgore Road</i></u>	<u><i>25(f)</i></u>

*Minimum Net Developable Land Area as defined by Policy FLU1.1.2B.

An undeveloped parcel of property that was legally created and recorded in the Public Records of Orange County prior to July 10, 2018, in the Lake Mabel, Berry Dease, and Chickasaw Rural Residential Enclaves; prior to October 16, 2018, in the Rocking Horse Rural Residential Enclave; and prior to (date of adoption – TBD) in the Kilgore Road Rural Residential Enclave and which meets all other applicable laws and regulations, shall be entitled to develop a single-family residential structure on such parcel without further board action regardless of whether such parcel meets the minimum net developable land area requirements of this Policy. (Added 08/18, Ord. 2018-17; Amended 10/18, Ord. 2018-23; Amended 01/21, Ord. 2021-04; Amended 01/23, Ord. 2023-04)

FLU8.1.1 The following future land use and zoning correlation table shall be used to determine zoning consistency with the Future Land Use Map. Land use compatibility, the location, availability and capacity of services and facilities; market demand, and environmental features shall also be used in determining which specific zoning district is most appropriate.

Density is restricted to the maximum allowed by the Future Land Use Map designation regardless of zoning.

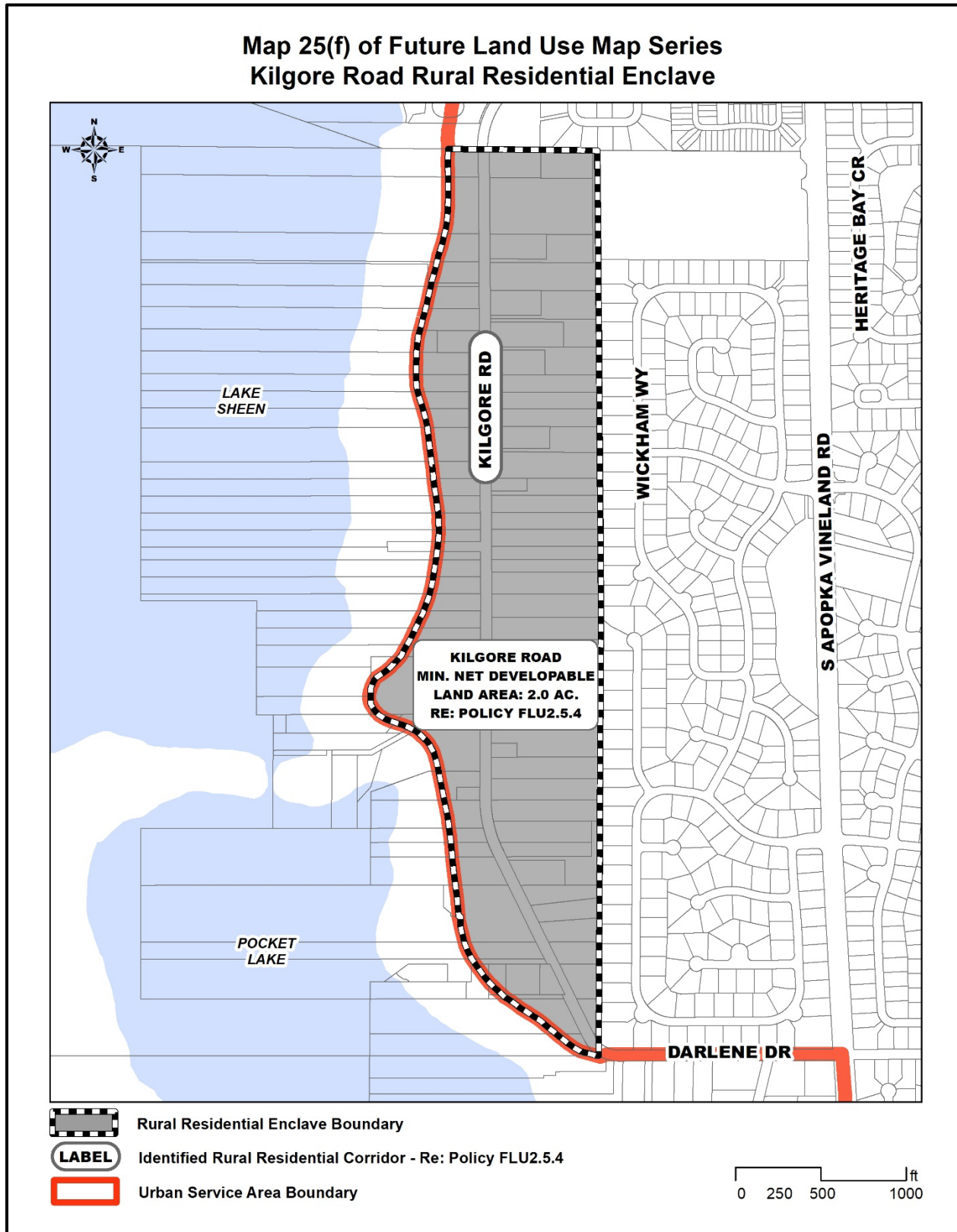
Density and Floor Area Ratio (FAR) calculation shall be defined as the language specified in Future Land Use Element Policy FLU1.1.2(C).

Orange County's **Future Land Use and Zoning Correlation Table** is referenced herein as follows:

<i>Future Land Use and Zoning Correlation</i>		
<i>FLUM Designation</i>	<i>Density/Intensity</i>	<i>Zoning Districts</i>
<i>Urban Residential</i>		
Low Density Residential (LDR)	(0 to 4 du/ac)****	A-1*, A-2*, R-CE* R-1, R-2**, R-1A, R-1AA, R-1AAA, R-1AAAA, R-T-1, R-T-2, R-L-D, PD, U-V * R-CE is not available as a rezoning request in the USA.
Low-Medium Density Residential (LMDR)	(0 to 10 du/ac) + workforce housing bonus	R-1, R-1A, R-2, R-T, R-T-1, PD, U-V
Medium Density Residential (MDR)	(0 to 20 du/ac) + workforce housing bonus	R-2, R-3, UR-3, PD, U-V
Medium-High Density Residential (MHDR)	(0 to 35 du/ac) + workforce housing bonus	R-2, R-3, UR-3, PD, U-V
High Density Residential (HDR)	(0 to 50 du/ac) + workforce housing bonus	R-2, R-3, UR-3, PD, U-V
<i>Urban and/or Non-Residential</i>		
Office (O)	1.25 FAR Unless otherwise restricted by County policy or code	P-O, PD
Commercial (C)	1.50 FAR unless otherwise restricted or increased by County policy or code	C-1, C-2, C-3, P-O, PD
Industrial (IND)	.75 FAR	I-1A, I-1/I-5, I-2/I-3, I-4, PD
Institutional (INST)	2.0 FAR	Any
Educational (EDU)	2.0 FAR	PD

<i>Future Land Use and Zoning Correlation</i>		
<i>FLUM Designation</i>	<i>Density/Intensity</i>	<i>Zoning Districts</i>
<i>Urban Mixed Use</i>		
Planned Development (PD)	See FLU8.1.2 and FLU8.1.4	PD
I-Drive Activity Center Mixed Use (ACMU) I-Drive Activity Center Residential (ACR)	See I-Drive Element	PD
Mixed-Use Corridor (MUC) (Staff-initiated)	3.0 FAR unless otherwise restricted by County policy or code (11 to 20 DU/AC)	PD, (Mixed Use District – to be developed); Staff-initiated; Urban Service Area only
<i>Area Specific</i>		
Neighborhood Center (NC) Neighborhood Activity Corridor (NAC) Neighborhood Residential (NR)	40 DU/AC (2.0) 25 DU/AC (1.0) 20 DU/AC (.40) Study required per FLU8.3.1	NC NAC NR
Village Classification (V) (Horizon West)	See Policy FLU4.1.9	PD within adopted Village Boundary or conventional zoning districts within a Rural Residential Enclave. (See below)
Traditional Neighborhood Development (TND)		PD
Growth Center (GC)	See FLU Goal 7	PD
Innovation Way Overlay	See FLU Goal 5	Innovation Way – Planned Development – Regulating Plan (IW-PD-RP)
I-Drive District Overlay	See Conceptual Regulating Plan, Map 23 of Future Land Use Map Series	PD, C-1, C-2, I-2/I-3
Rural Residential Enclave (FLUM designation varies)	See Objective OBJ2.5, related sub-policies, and Maps 25(a) through 25(d)(f) of the Future Land Use Map Series.	PD, R-CE, A-1, A-2, A-R, R-1A, R-1AA (See: Maps 25(a) through 25(d)(f) of the Future Land Use Map Series for minimum area requirements and location of identified Rural Residential Corridors.
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Figure 4, Proposed Map 25(f), Kilgore Road Rural Residential Enclave



PLANNING AND ZONING COMMISSION (PZC)/LOCAL PLANNING AGENCY (LPA) PUBLIC HEARING SYNOPSIS (January 16, 2025)

Staff presented the staff-initiated **Amendment 2024-2-B-CP-1** establishing the Kilgore Road Rural Residential Enclave with the recommendation of TRANSMITTAL. Following the staff presentation, one member of the public who lives on Kilgore Road spoke in support of the Rural Residential Enclave designation for Kilgore Road neighborhood. The Local Planning Agency found the amendment sufficiently complete, the amendment has the potential to be found in compliance, and recommended to the Board of County Commissioners **TRANSMITTAL** for state and regional agency review.

Motion / Second	<i>David Boers / Eric Gray</i>
Voting in Favor	<i>Camille Evans, George Wiggins, Nelson Pena, Michael Arrington, David Boers, and Eric Gray</i>
Voting in Opposition	<i>None</i>
Absent	<i>Evelyn Cardenas and Eddie Fernandez</i>

BOARD OF COUNTY COMMISSIONERS TRANSMITTAL PUBLIC HEARING SYNOPSIS (February 11, 2025)

Amendment 2024-2-B-CP-1 establishing the Kilgore Road Rural Residential Enclave was presented to the Board of County Commissioners on February 11, 2025, with the LPA and staff recommendation of TRANSMITTAL. Following the staff presentation, one member of the public spoke in support of the Kilgore Road Rural Residential Enclave designation for the Kilgore Road neighborhood. After discussion, the BCC found the amendment sufficiently complete, has the potential to be found in compliance and a motion was made by Commissioner Wilson and seconded by Commissioner Uribe to transmit **Amendment 2024-2-B-CP-1** for state and regional agency review.

The motion carried 6-0 to **TRANSMIT** Amendment 2024-2-B-CP-1.

<i>Motion/Second</i>	<i>Commissioner Wilson / Commissioner Uribe</i>
<i>Voting in Favor</i>	<i>Mayor Demings, Commissioner Wilson, Commissioner Uribe, Commissioner Gomez Cordero, Commissioner Semrad, Commissioner Scott</i>
<i>Voting in Opposition</i>	<i>None</i>
<i>Absent</i>	<i>Commissioner Moore</i>

PLANNING AND ZONING COMMISSION (PZC)/LOCAL PLANNING AGENCY (LPA) ADOPTION PUBLIC HEARING SYNOPSIS (March 20, 2025)

Chief Planner Jim Resta provided an overview of staff-initiated **Amendment 2024-2-B-CP-1**, establishing the Kilgore Road Rural Residential Enclave, with the recommendation that the LPA make a finding of **consistency** with the Comprehensive Plan and recommend **ADOPTION** of the proposed amendment. One

member of the public, who resides on Kilgore Road, spoke in support of the designation of the Kilgore Road neighborhood as a Rural Residential Enclave.

Commissioner Wiggins made a motion, seconded by Commissioner Holt, to recommend to the Board of County Commissioners **ADOPTION** of Amendment 2024-2-B-CP-1. The motion carried by a vote of 6-0, with Commissioners Cardenas, Fernandez, Gray, Holt, Pena, and Wiggins voting in favor of adoption.

Motion / Second	<i>George Wiggins / Marjorie Holt</i>
Voting in Favor	<i>Evelyn Cardenas, Eddie Fernandez, Eric Gray, Marjorie Holt, Nelson Pena, and George Wiggins</i>
Voting in Opposition	<i>None</i>
Absent	<i>Michael Arrington, David Boers, and Camille Evans</i>

