



TO: Kenton County Planning Commission Members

FROM: Andy Videkovich, AICP
Director of Planning

RE: Staff Recommendations for the SPECIAL Public Hearing

DATE: December 29, 2025

PDS submits the attached report and recommendation for your review prior to the scheduled **January 06, 2026**, *SPECIAL* public hearing. This information relates to the following agenda item:

FILE NUMBER: PC-25-0010-PF

APPLICANT: Robert Ehmet Hayes & Associates per Amy Sanders on behalf of Ludlow Independent Schools

LOCATION: 479 Victoria Street and 77 Adela Avenue, Ludlow

REQUEST: A public facility review per KRS 100.324 and KRS 147.680. The applicant proposes to construct a 9,280 square foot indoor practice facility with associated parking and pedestrian areas.

Staff will be prepared to address your comments and/or questions regarding the project during the public hearing. If you need additional information or clarification prior to that time, don't hesitate to contact me.

cc: Ryan Ficke, Robert Hayes & Associates – Applicant
Jason Steffen, Superintendent - Ludlow Independent School District - Owner
Amy Sanders, Robert Hayes & Associates – Contact

[Joshua R. Wice, Ed.D., Executive Director](#)

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Text Amendment

File Number: PC-25-0010-PF

Jurisdiction: City of Ludlow

Applicant: Robert Ehmet Hayes & Associates
per Amy Sanders on behalf of Ludlow
Independent SchoolProject Manager: Cody Sheets, AICP,
Principal Planner**GENERAL CASE INFORMATION**

1. **Request:** A public facility review per KRS 100.324 and KRS 147.680. The applicant proposes to construct a 9,820 square foot indoor practice facility with associated parking and pedestrian areas.

Location: 479 Victoria Street and 77 Adela Avenue, Ludlow**SITE CHARACTERISTICS**

1. The area of proposed development is 0.46 acres and is located to the east of Adela Avenue between Victoria Street and Mayfield Alley. The property contains a Ludlow Independent Schools maintenance building as well as a vacant area that has been used for storage.

2. The site in question is located within the urban subarea. The surrounding area consists of athletic fields, parks, a school, and single-family residential homes.

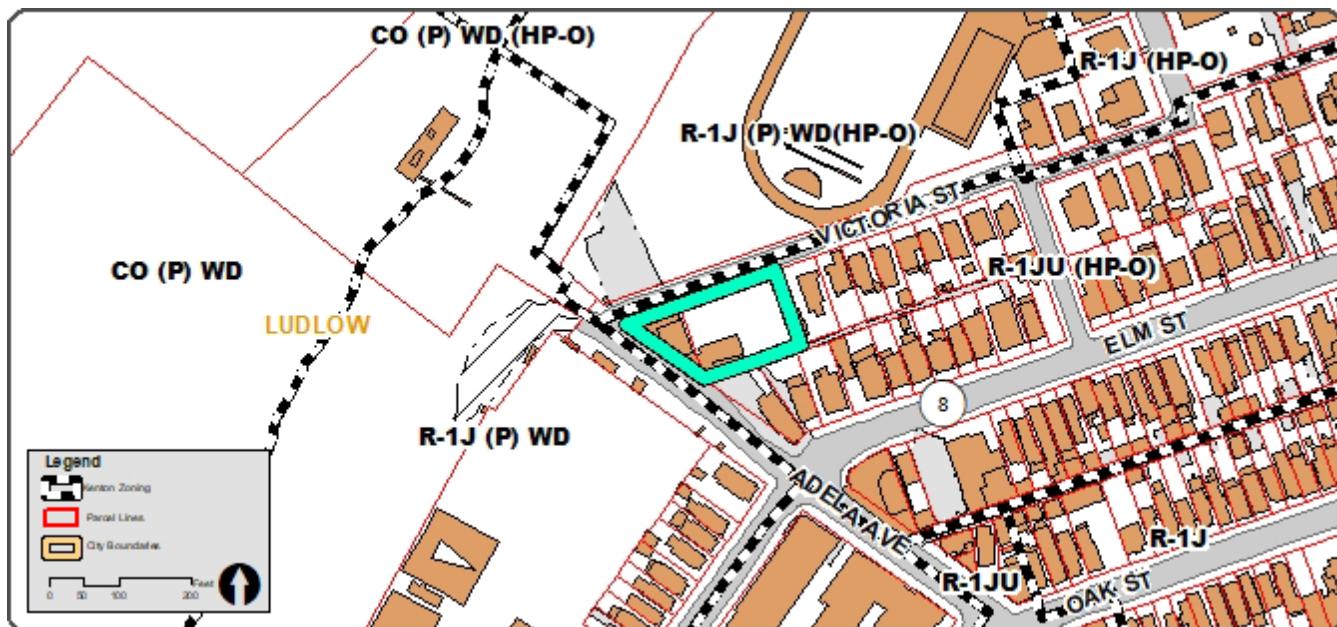
ANALYSIS

1. Current Zoning

	ZONING	MINIMUM LOT SIZE	MAXIMUM DENSITY
CURRENT	R-1JU (HP-O)	22,500 sq. ft.	14.52 du/na
NORTH	R-1J (P) WD (HP-O)	22,500 sq. ft.	14.52 du/na
SOUTH	R-1JU (HP-O) R-1J (P) WD	22,500 sq. ft.	14.52 du/na
EAST	R-1JU (HP-O)	22,500 sq. ft.	14.52 du/na
WEST	R-1J (P) WD	22,500 sq. ft.	14.52 du/na

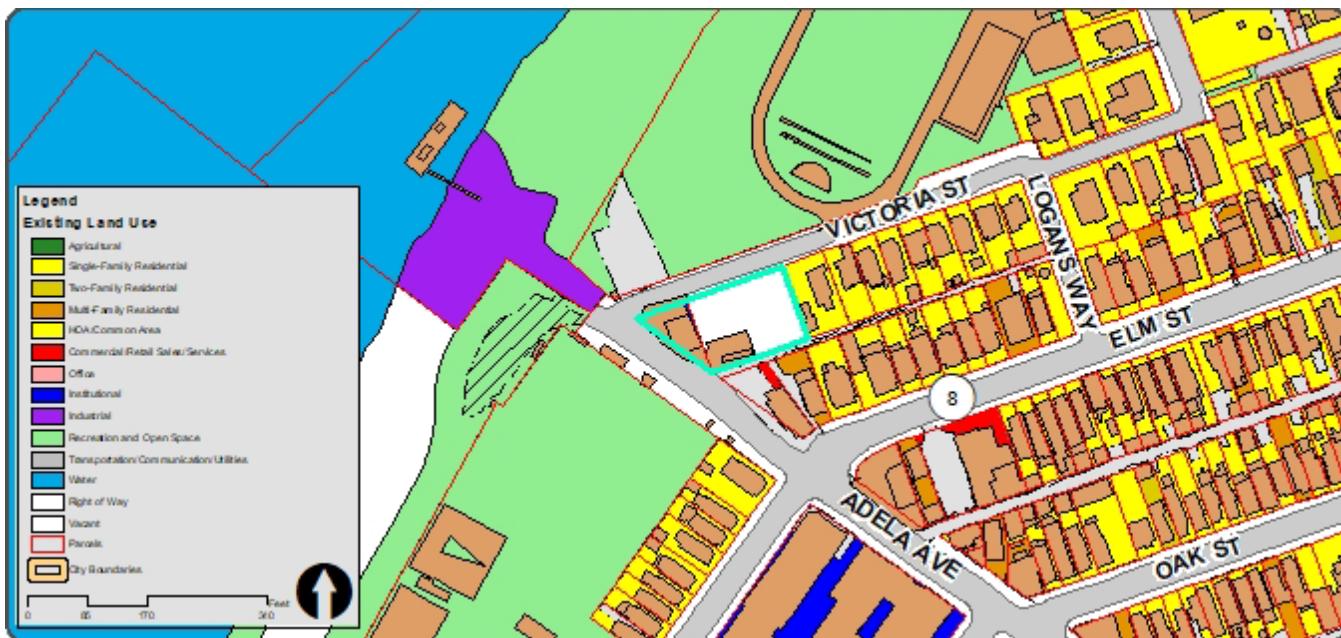
The site in question is currently zoned R-1JU (HP-O). The R-1JU (HP-O) Zone conditionally permits public and parochial schools, publicly owned and/or operated parks, playgrounds, golf courses, community recreation centers, swimming pools, and libraries subject to the following area and height requirements for conditional uses:

- a. Minimum lot area – 22,500 square feet;
- b. Minimum lot width – 150 feet;
- c. Minimum front yard depth – 50 feet
- d. Minimum side yard depth – 50 feet;
- e. Minimum rear yard depth – 50 feet;
- f. Maximum building height – 35 feet.



2. Existing Land Use

	DESCRIPTION
CURRENT	Institutional and vacant
NORTH	Recreation and open space
SOUTH	Commercial, multi-family residential, and single-family residential
EAST	Single-family residential
WEST	Recreation and open space



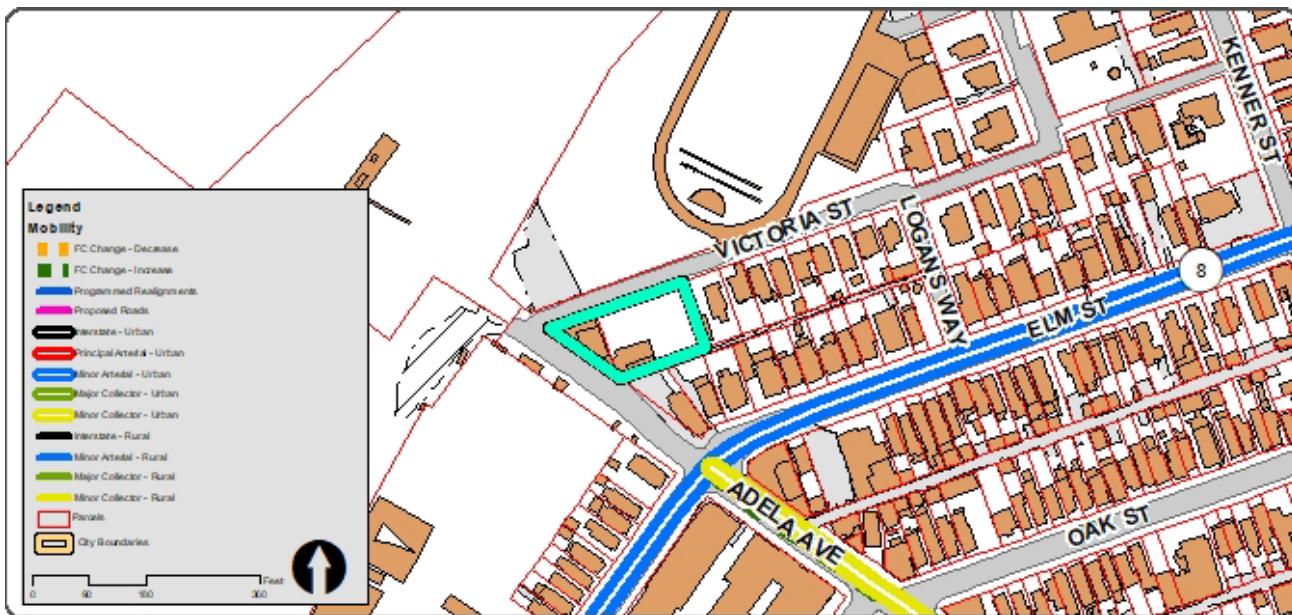
PETITION REVIEW

1. The submitted development plan and associated materials indicate the following (see attached for reference):
 - a. Removal of an existing maintenance building;
 - b. Construction of an approximately 9,820 square foot proposed indoor practice facility;
 - c. Six parking spaces directly off Adela Avenue;
 - d. One ADA van parking space off Adela Avenue;
 - e. Pedestrian walkways including two connections to Victoria Street including five entrances to the building;
 - f. A stairway and pedestrian entrance to the building from Mayfield Alley; and
 - g. An ADA accessible ramp on the west and south side of the building with an associated entrance to the building.
2. The property is located in the HP-O (Historic Preservation Overlay) Zone which is intended to preserve structures, buildings, appurtenances, and places that are of basic and vital importance for the development of the culture, because of their association with history; because of their unique architectural style and scale, including color, proportions, form, and architectural details; or because of their being a part of or related to a square, park or area of cultural, historical, or architectural important to the city. This zone is intended to work in conjunction with the other

zones and for the purpose of protecting and preserving the exterior of the buildings, structures, appurtenances, and places.

COMPREHENSIVE PLAN

1. **Mobility:** Elm Street is identified as a minor arterial. Adela Avenue south of the existing property is identified as a minor collector. There are sidewalks on the western side of Adela Avenue near the proposed public facility. There are sidewalks on both sides of Adela Avenue south of the proposed public facility and on both sides of Elm Street. There are TANK bus stops on both the southeastern and southwestern intersection of Adela Avenue and Elm Street.



2. **Comprehensive Plan:** A full review of the Direction 2030: Your Voice. Your Choice. goals, objectives, recommendations, and tasks was conducted by staff. The full review is available in the issue file. The following is a summary of what staff finds to be the most relevant sections:
 - a. **PDS staff finds that the submitted request is consistent with the following:**
 - i. **Goals and Objectives**
 - ii. **Sub Area (Urban) Element**
 - iii. **Community Facilities Element**

Staff findings: The proposed development will allow for a natural extension of the existing Ludlow School Independent School district athletic facilities while developing an underutilized property. It will also serve as a functional property linking the Ludlow Independent School district athletic facilities and Ludlow Memorial Park. The development also is near the Ludlow school building which can allow walking between the two locations.

3. Recommended Land Use

	DESCRIPTION
CURRENT	Mixed use
NORTH	Mixed use
SOUTH	Mixed use
EAST	Residential 7.1 to 14
WEST	Mixed use



- a. The site is located within a FEMA mapped regulatory floodplain and part of the site is in DSA (Developmentally Sensitive Areas). Additional considerations and regulations will apply to any development in the area.



Staff findings: The most appropriate recommended land use would be other community facilities, but this recommended land use type is typically given to existing community facilities. Mixed use is the recommended land use which states that for this area can include one or more of the following uses: commercial, recreation and open space, residential, and entertainment such as hospitality, restaurants and bars, and related riverfront uses. The proposed use would allow for a facility which serves the needs of student athletes to be placed near the existing school and existing residential homes as the site has good access to the surrounding community. Special consideration should be given to development in identified floodplains.

STATE STATUTE

1. KRS 100.324 (4) states:
 - a. Any proposal for acquisition or disposition of land for public facilities, or changes in the character, location, or extent of structures or land for public facilities ... shall be referred to the commission to be reviewed in light of its agreement with the comprehensive plan, and the commission shall, within sixty (60) days from the date of its receipt, review the project and advise the referring body whether the project is in accordance with the comprehensive plan. If it disapproves of the project, it shall state the reasons for disapproval in writing and make suggestions for changes which will, in its opinion, better accomplish the objectives of the comprehensive plan. No permit required for construction or occupancy of such public facilities shall be issued until the expiration of the sixty (60) day period or until the planning commission issues its report, whichever occurs first.
2. KRS 100.361 states:
 - a. Nothing in this chapter shall impair the sovereignty of the Commonwealth of Kentucky over its political

subdivisions. Any proposal affecting land use by any department, commission, board, authority, agency, or instrumentality of the state government shall not require approval of the local planning unit. However, adequate information concerning the proposals shall be furnished to the planning commission by the department, commission, board, authority, agency, or instrumentality of state government.

3. KRS 147.680 states:

- a. No public agency shall construct or authorize the construction of any public facility, which is determined by the area planning commission to be of area-wide significance, within the area planning boundaries until and unless the proposed location and extent of such public construction or authorization shall have been reviewed and recommendations made to the appropriate public agency by the area planning commission.

STAFF RECOMMENDATION: The proposed facility is in agreement with the comprehensive plan per KRS 100.324 and KRS 147.680.

SUPPORTING INFORMATION/BASES FOR STAFF RECOMMENDATION

1. Staff finds that the submitted Public Facilities Request is generally consistent with the goals, objectives, and recommendations of the 2024 Kenton County Comprehensive Plan. The proposed development will provide an opportunity to link existing school athletic facilities with an existing park. The site is also near residential homes which can allow for multimodal access options while providing improved amenities for local students.

ADDITIONAL INFORMATION

1. On June 26, 2014, the PDS Management Board delegated the responsibility for public facilities reviews under KRS 147.680 to the Kenton County Planning Commission per Resolution 2014-01. This was done to provide for a more efficient planning operation and to streamline and realign the responsibilities of Kenton County's planning framework.
2. Per KRS 100.361, the Ludlow Independent Schools is an instrumentality of the state government and therefore exempt from local zoning regulations. However, in order to ensure the proper integration of the proposed development into the surrounding area, staff recommends the following regarding the Ludlow Zoning Ordinance:
 - a. No lighting shall be permitted which would glare from this zone onto any street or into any adjacent property.
A photometric plan was not provided with the submitted site plan but efforts should be made to prevent light from glaring onto any street or into any adjacent property.
 - b. Section 10.4, H., 2. of the Ludlow Zoning Ordinance states that no outdoor storage of any material (usable or waste) shall be permitted in this zone, except within enclosed containers
No outdoor storage or dumpsters are shown but if any outdoor storage is to take place it should be within enclosed containers.
 - c. Section 10.4, H., 4. of the Ludlow Zoning Ordinance states that where any yard of any conditionally permitted use in this zone abuts property in a single-family residential zone, a ten (10) foot wide screening area, as regulated by Section 9.17 of this ordinance shall be required. Meeting these requirements as closely as possible is recommended.

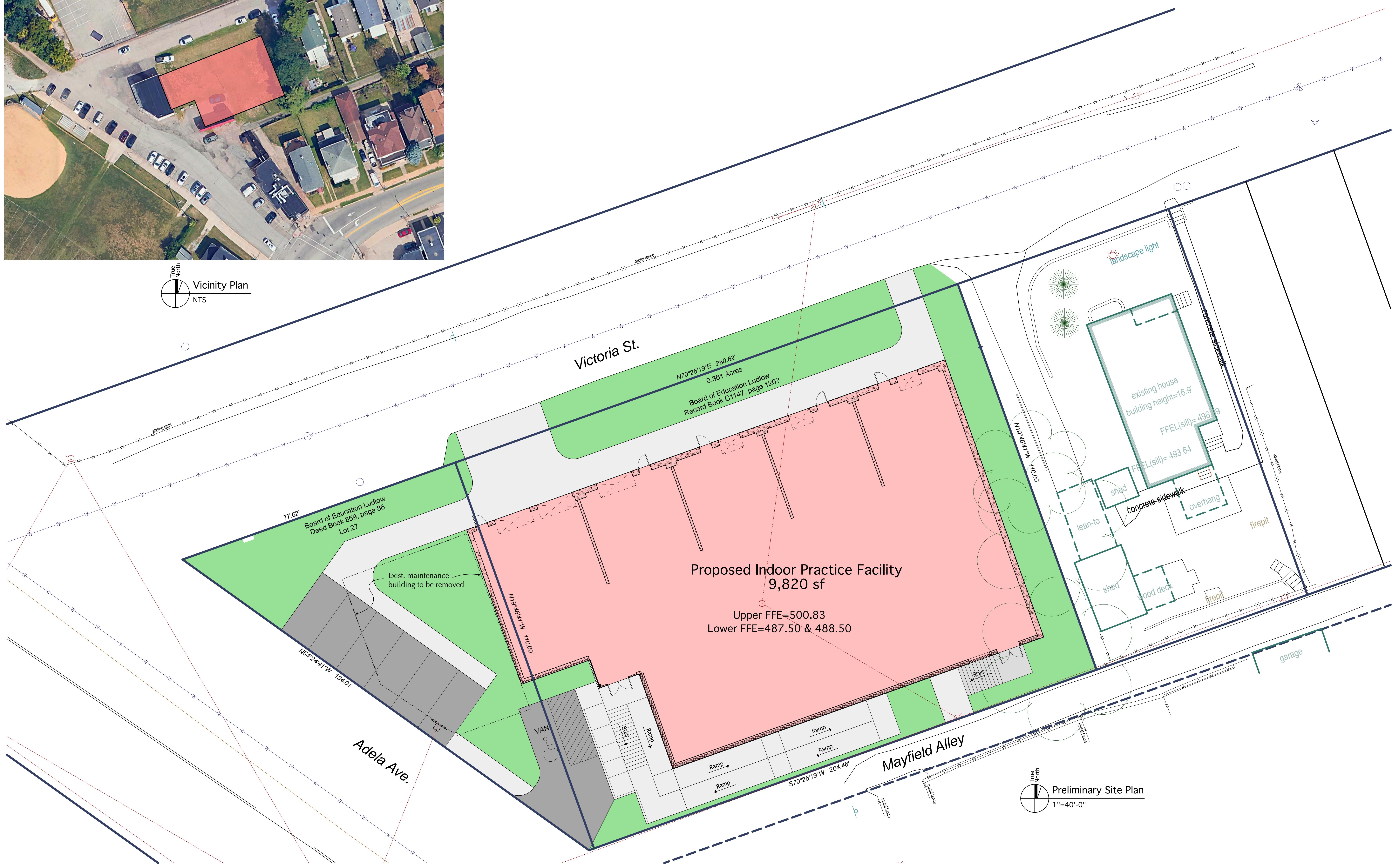
- d. Section 10.14, F. of the Ludlow Zoning Ordinance lists other development controls for properties located in the HP-O Zone including:
 - i. No new construction is permitted unless the work is determined to be consistent with the Ludlow Historic Design Guidelines.
 - ii. No demolition of buildings or structures is permitted unless it is reviewed and approved by the Urban Design Review Board as set forth in Section 20.2

Although exempt from zoning requirements, coordination should take place with the Urban Design Review Board to ensure that their guidelines are being followed.
- e. Section 11.1 lists requirements for the design and layout of off-street parking areas including a minimum parking space size of nine feet in width and 18 feet in length. The dimensions of the parking spaces are not shown but attempts should be made to abide by these requirements.
- f. Section 14.8 lists signs allowed in single-family and two-family residential districts and Section 14.11 states the following for signs allowed in historic districts:
 - i. The signs allowed on a site in a Historic Preservation Overlay District shall be the same as those allowed in the underlying zoning district. All signs must receive a certificate of appropriateness through the Urban Design Review Board and must meet the Ludlow Historic Design Guidelines.

No signage plans were provided but if signage is to be present efforts should be made to match the allowed sign requirements listed in Section 14.8 and discussions should be had with the Urban Design Review Board.
- g. The applicant should coordinate with the city regarding access for the off-street parking spaces that are located directly off Adela Avenue.

3. Building and electrical permits are required prior to construction.

4. Section 9.25, E. lists provisions for flood hazard reduction including general and specific construction standards. Since part of the property is located within the AE floodplain these guidelines must be followed.



REH & A
ARCHITECTS

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**Ludlow Independent Schools –
Indoor Practice Facility**



SHEET TITLE

BG #
333-825

REH #

DATE

PS1

