

Exhibit C

Rezoning Justification

This Rezoning Application (the “Rezoning”) is filed concurrently with a Text Amendment Application (“Text Change”) to facilitate the development of Arden – a senior housing community (the “Project”) located along the Town’s Main Street corridor at 4724 Burlington Mills Road (the “Property”).

The current senior housing market is characterized by government subsidized affordable senior housing on one end, and luxury all-inclusive senior housing on the other; leaving a large demographic of seniors unserved. This group is referred to as the missing middle – seniors who earn too much in retirement to qualify for medicare but not enough to afford all-inclusive congregate care facilities; often retired teachers, police officers, and nurses.

Arden seeks to serve missing middle seniors as an active adult, age-restricted community with congregate-care style living, controlled access, interior corridors and elevators, walking paths, fitness centers, and natural areas. Arden will offer residents the opportunity to live independently in a community designed specifically for active seniors with amenities such as a community dining room, craft/business center, library, pool, and fitness center. To ensure affordability to middle market senior residents, Arden will provide some services, including access to care and personal services such as dining, housekeeping, home and grounds maintenance, and security, on an a la carte basis through third party partnerships. This model allows residents to control costs by tailoring their level of services to their specific needs.

The Project – which will diversify housing options in Rolesville and allow residents to age in place – is consistent with the Town’s long range plans as set forth in the Comprehensive Plan, the Main Street Vision Plan, the Parks and Recreation Comprehensive Master Plan, and the Greenway Plan. Specifically, the Project is consistent with the following policies:

- Main Street Vision Plan, Corridor Development Strategy 1 for the Central – Lifestyle Village (Main & Burlington Mills): “Support market rate housing development with mix of product types: townhomes, apartments, senior housing.” *Main Street Vision Plan*, pg. 80.
- Main Street Vision Plan, Corridor Development Strategy 3 for Central – Lifestyle Village (Main & Burlington Mills): “Housing product to incorporate higher densities.” *Main Street Vision Plan*, pg. 80.
- Main Street Vision Plan, Corridor Development Strategy 1 for All Areas – “Facilitate expanded new housing options along the corridor.” *Main Street Vision Plan*, pg. 80.
- Main Street Vision Plan, Goal #2: Promote diverse housing stock for multiple age groups and income levels: “One of the top issues raised by residents of Rolesville and people who want to move to Town is the lack of diverse housing. There are ***few multifamily options*** and most of the single-family housing starts at \$300,000, well out of the budget for workforce buyers and renters. By ***diversifying the housing for*** millennials and ***aging***

retirees, the opportunity arises for more people to live, work, and shop in Rolesville, boosting the local economy and creating the ***opportunity for multiple generations of families to remain in the community they made a life in.***” *Main Street Vision Plan*, pg. 16 (*emphasis added*).

- Comprehensive Plan Goal LU1. Encourage a walkable, connected Town in the face of rapid growth. *Comprehensive Plan* pg. 42.
- Comprehensive Plan Goal D1.1. Take actions to ensure that new housing stock provides diverse options around Main Street. “New neighborhoods that are developed should provide ***a mix of housing options for*** young adults, families, ***senior citizens***, etc. ***so that citizens can age in place*** and have options for their housing expectations.” *Comprehensive Plan* pg. 83 (*emphasis added*).

- Response: The Project will diversify housing options along the Main Street corridor by offering a new housing option for active seniors that’s not currently available. Aging Rolesville residents will have the option to age in place rather than move to neighboring cities and towns.

The Project is also strategically located to take advantage of the Main Street improvements already underway and future redevelopment along the Main Street corridor. It will front on the new realigned Burlington Mills Road, just a short walk from existing shops and restaurants along Main Street and directly across Main Street from the planned Wallbrook development. Residents will have convenient access to a grocery store and the Project will bring much needed daytime foot traffic to Rolesville to patronize shops and restaurants and promote the development of additional retail shops downtown.

- Comprehensive Plan Goal D2.3. Support biking and walking facilities. “Identify important routes that connect multiple neighborhoods and improve these for non-vehicle traffic by adding unique facilities like a cycle track multiuse path, or extending greenway facilities. Creating a trail system that connects neighborhoods with downtown will create an alternative transportation system to the street network.” *Comprehensive Plan* pg. 84.
- Response: As shown on the Concept Plan, the Project will feature the construction of a 10-foot greenway path along the southern portion of the Property as envisioned by the Greenway Plan. Additionally, the Project will feature sidewalks that will connect with improvements along Main Street to provide interconnectivity between the Project and future neighborhoods and commercial uses along Main Street.

Finally, the Project will add to the Town’s tax base without placing an undue burden on the Town’s infrastructure. In operating senior housing communities, Arden has found that residents typically drive and consume less than residents of market rate apartment communities, placing less stress on transportation, water, and sewer infrastructure. Potential negative effects of the Project will be mitigated by the proposed rezoning conditions which restrict permitted uses to Residential Care and limit the Project to a maximum of 160 senior housing units.